U.S. Department of Transportation
Federal Aviation Administration
Southwest Region

FINDING OF NO SIGNIFICANT IMPACT
and
RECORD OF DECISION

Terminal Replacement Project
Ponca City Regional Airport, Ponca City, OK

March 2026

I. INTRODUCTION

The FAA is the Federal agency responsible for the approval of the proposed federal actions outlined above and analyzed in the Environmental Assessment (EA). The FAA has determined that the Proposed Action will have no significant impact on the human environment. Attached to this FONSI/ROD is the EA on which the finding is made.

II. SUMMARY

This Environmental Assessment (EA) has been prepared in accordance with the National Environmental Policy Act (NEPA) 42 U.S.C. § 4321 et seq. NEPA requires federal agencies to analyze and consider alternatives to the environmental impacts of their proposed actions, to disclose and consider mitigation for those impacts, and to provide interested parties with an opportunity to participate in the environmental review process. Guidance for consideration of environmental impacts is provided in Federal Aviation Administration (FAA) Order 1050.1F[1], Environmental Impacts: Policies and Procedures (FAA, 2015), FAA Order 1050.1F Desk Reference (FAA, 2023), and FAA Order 5050.4B, NEPA Implementing Instructions for Airport Actions (FAA, 2006).

III. BACKGROUND

The Proposed Action is the construction of a replacement terminal, demolition of the existing terminal, construction of a new parking lot, and expansion of the aircraft apron.

Ponca City Regional Airport (PNC or Airport) is in Kay County, Oklahoma (132234.9000N,

[1] FAA Order 1050.1G, FAA National Environmental Policy Act Implementing Procedures was published on July 3, 2025. Projects that commence after July 3, 2025, are required to comply with FAA Order 1050.1G, while those projects already underway by that date may follow FAA Order 1050.1F. This EA relies upon FAA Order 1050.1F, the Fiscal Responsibility Act of 2023, Executive Order (E.O.) 14173, *Ending Illegal Discrimination and Restoring Merit Based Opportunity*, E.O. 14154, *Unleashing American Energy*, and the Supreme Court's decision in *Seven County Infrastructure Coalition v. Eagle County,* 605 U.S. 168 (2025).

349559.2000W) primarily serves general aviation operations, and hosts the Northern Oklahoma Flight Academy. PNC is comprised of one runway, Runway 17-35, 7201 feet x 100 feet, a full-length taxiway, a terminal building, and aircraft parking areas.

The airport also has an air traffic control tower that is integrated into the existing terminal building but has never been utilized. The existing terminal is a 7,326 square foot building with amenities that include a lounge area, a fixed base operator (FBO), and a restaurant. A FBO is a business or service provider located at an airport that offers a range of support services for general aviation (non-airline) aircraft, pilots, and passengers.

IV. PURPOSE AND NEED

Purpose: The purpose of the Proposed Action is to replace the existing terminal with a new terminal that meets modern operational requirements and removes the airspace obstruction caused by the air traffic control tower.

Need: The existing terminal building was constructed in 1952. The current layout and size constrain the airport's ability to meet modern passenger needs and limits potential growth at the airport. In addition, the current aircraft parking apron is deficient.

The existing terminal building is a Part 77 transitional surface obstruction, penetrating the surface by 6 feet, and is therefore a hazard to navigation.

A. Federal Aviation Administration Part 77 (14 CFR Part 77) Obstruction

14 CFR Part 77 focuses on the safe and efficient use of navigable airspace by establishing standards for determining obstructions to air navigation (FFA 2025c). Federal Aviation Regulation (FAR) Part 77 establishes standards for determining what constitutes an obstruction to air navigation and requires notification to the FAA for certain proposed construction or alterations. Part 77 surfaces are imaginary, invisible zones around airports and runways, defined by their approach classification, that must be kept clear of obstructions. A Part 77 obstruction refers to an object that may affect the national airspace, air navigation facilities, or airport capacity. There are specific height thresholds and proximity limits to different types of airports and roadways that, if exceeded by a proposed structure, are presumed to be a hazard.

In 1992, PNC installed an instrument landing system (ILS). The ILS is a ground-based navigation aid that provides precise guidance to aircraft during the approach and landing phase, especially in low visibility conditions. This converted the runway to a precision instrument runway. A precision instrument runway equips aircraft with an ILS that enables precision approaches, giving pilots both lateral and vertical guidance. These include runway markings and lighting for low visibility, approach lighting systems to assist pilots during final approach, and higher safety standards than non-precision runways. The airport expanded the primary surface width of the runway to 100 feet. This modification made the air traffic control tower, located on top of the terminal, an obstacle to the Part 77 transitional surface. Therefore, to meet Part 77, the obstruction must be mitigated and/or removed.

B. Terminal Apron Deficiency

The apron east of the existing terminal was removed when Taxiway A was relocated to meet FAA separation requirements between a taxiway and a runway. Therefore, the apron will be expanded to the east to provide sufficient aircraft parking and movement and to ensure direct airside access.

C. Landside Facilities

The new terminal will be constructed on the existing landside parking lot; therefore, a new parking lot will be constructed to ensure landside access for passengers and visitors.

V. ALTERNATIVES

The FAA explored and objectively evaluated reasonable alternatives that were considered practical and feasible in meeting the purpose and need.

A. No Action

Inclusion of a No Action Alternative (NAA) in the environmental analysis and documentation is required under FAA Order 1050.1F. The NAA is used to evaluate the effects of not constructing the project, thus providing a benchmark against which action alternatives may be evaluated. Under the NAA, a new terminal would remain in its current location, the apron would not be expanded, and the parking lot would not be constructed. The existing terminal would remain a Part 77 obstruction and would remain a hazard to air navigation. This alternative does not meet the purpose and need of the Proposed Action. There would be no direct environmental impact, the existing terminal would remain at the current location.

B. Alternative B – Proposed Action (Preferred Alternative)

PNC proposed the following improvements at the airport.

1. Construction of a New Terminal Building
    - Location & Size: Approximately 14,025 square feet, situated on the west side of the existing apron shown in Figure 2.

    - Construction Details: Steel framing, concrete foundation, glass and metal exterior panels with modern interior finishes.

    - Inside new terminal building:
        - Airport administrative offices,
        - Passenger gates and ticket counters,
        - Space for security screening equipment,
        - A restaurant.

2. Constructing a New Parking Lot
    - An approximate 60,000 square feet paved parking area adjacent to the new terminal to provide convenient access for passengers and staff.

3. Demolition of Existing Terminal

4. Apron Expansion
    - Expansion of the paved aircraft parking area on the east side of the new terminal to accommodate additional aircraft parking and connect the terminal to air-side operations.

The new terminal would be located west of the current terminal where the current parking lot is located. The new parking lot would be located west of the new terminal. Figure 2 of the attached EA depicts the footprint of the Proposed Action.

C. Alternative C – Remediate Structural Issues and Recommission Building

PNC considered rehabilitating the existing terminal. The current layout and square footage (7,326) of the building does not allow for the space needed for the lounge area, FBO, or the restaurant. The Airport and its tenants require an additional 8,000 square feet to meet the requirements for Alternative C.

The resulting hybrid approach would involve both renovation and expansion, increasing complexity and construction costs. From an operational standpoint, renovation would require temporary or extended closure of the FBO.

The top of the building (the tower) would need to be removed, or the building would need to be moved west to no longer be an obstruction. The structural integrity of the building would come into question with the removal of the top portion of the building. The extensive engineering and design of a remediated Terminal to meet the purpose and need would be cost-prohibitive

With the near-total reconstruction and reconfiguration of the Terminal required to meet the purpose and need of the project, the rehabilitation option would not be a prudent alternative due to the cost and operational delays. Therefore, it is eliminated from further consideration.

VI. ENVIRONMENTAL CONSEQUENCES

A. Resource Categories Affected by the Proposed Action

1. Department of Transportation Section 4(f)

The Proposed Action would demolish the terminal and result in a physical use of the terminal, a structure eligible for listing on the National Register of Historic Places (NRHP). Because the Proposed Action proposes to demolish the terminal, an Individual Section 4(f) evaluation is required and was performed. The 4(f) report can be found in Appendix B of the attached EA.

As part of the Section 4(f) process, an alternatives analysis conducted on behalf of the Airport, coordinated with the City of Ponca City and FAA, determined there is no feasible and prudent alternative that meets the purpose and need. One other alternative was considered, renovation/relocation - Alternative C. This alternative is discussed in Section 3.3 in the referenced report. The analysis concluded that there is no feasible and prudent alternative to avoid the physical use of the existing terminal.

The U.S. Department of the Interior provided the following Section 4(f) concurrence regarding the Proposed Action:

The Department concurs with the FAA's Draft Individual Section 4(f) Evaluation that there are no prudent and feasible avoidance alternatives for Section 4(f) use of the historic property noted, and that the FAA has adequately planned to minimize harm to the Section 4(f) property. The Department concurs that the proposed project would result in an adverse effect to the existing terminal building, and that this adverse effect results in a permanent physical "use" of the property beyond the de minimis use. Because the FAA, PNC, and the Oklahoma State Historic Preservation Office are entering into a Memorandum of Agreement in accordance with Section 106 of the National Historic Preservation Act, the Department has no objection to Section 4(f) approval of this project.

2. Historical Architectural and Cultural Resources

In 2023, the current terminal was determined to be eligible for listing on the NRHP. In anticipation of the removal of the current terminal, the City entered into a Memorandum of Agreement (MOA) with the Oklahoma Historical Society - State Historic Preservation Office, the City of Ponca City, and the FAA.

FAA, the City of Ponca City, and the SHPO agreed that the project shall be implemented in accordance with the following stipulations to consider the effect of the Proposed Action on historic properties, mitigating the adverse effect on historic properties, and satisfactorily completing FAA's Section 106 responsibilities under the NHPA. Mitigation measures from the resulting Memorandum of Agreement are summarized in Section VIII below.

B. Resource Categories Unaffected by the Proposed Action

The analysis included in Section 4 of the attached EA demonstrates that many resource categories will not be impacted by implementation of the Proposed Action. In particular, Section 4.2 of the EA indicates that the following resource categories were not evaluated further in the EA because the resources were not located in proximity to the proposed project area or were unaffected: Climate, Coastal Resources; Farmlands; Land Use; Natural Resources and Energy Supply; Socioeconomics and Children's Environmental Health and Safety Risks. In addition, other resource categories will not be discussed in detail in this FONSI/ROD because, as documented in Section 4 of the EA, there is no potential for significant impact. These categories include: Air Quality; Biological Resources, including Fish, Wildlife, and Plants; Hazardous Materials, Solid Waste, and Pollution Prevention; Noise; Visual Effects; Water Resources, including, Wetlands, Surface Waters, and Groundwater.

VII. AGENCY COORDINATION AND PUBLIC INVOLVEMENT

Coordination letters were sent to applicable local, state, and federal agencies and tribal organizations to solicit input regarding potential environmental and cultural resources which could be impacted by the Proposed Action. The agencies consulted during the preparation of this EA are included in Table 5 of the attached EA.

Hard copies of the draft EA were made available for public review at the Ponca City Airport office located at 2231 Waverly Street, Ponca City, OK, and online on the City of Ponca City website (www.poncacityok.gov\airportDEA) for a 30-day period. A Notice of Availability was published in the Ponca City News on January 15, 2026. During that 30-day period, a notice affording an opportunity for a public meeting was provided. The public review and comment period concluded on February 14, 2026, and no comments were received.

VIII. CONDITIONS AND MITIGATION

Per FAA Order 1050.1F, the FAA will state in the FONSI the authority for any mitigation that FAA has adopted and any applicable monitoring or enforcement provisions. If FAA finds no significant effects based on mitigation, the mitigated finding of no significant impact will state any mitigation requirements enforceable by the agency or voluntary mitigation commitments that will be undertaken to avoid significant effects.

Section 106 of the National Historic Preservation Act of 1966 requires all federal agencies to consider the impacts of a project on historic properties and allow the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment on any undertaking that would adversely affect properties eligible for listing in the NRHP. Federal agencies are required to consult with certain parties, such as the State Historic Preservation Office (SHPO) and the Tribal Historic Preservation Office (THPO) of a Federally Recognized Indian Tribe pursuant to Section 1010(d)(2) of the NHPA. With respect to the Proposed Action, the following mitigation measures are a condition of approval.

- **Professional Qualification Standards**

  The City of Ponca City will ensure that all actions prescribed by the MOA are carried out by, or under the direct supervision of, qualified professional(s) who meet the appropriate standards in the applicable disciplines as outlined in the *Secretary of the Interior's Professional Qualifications Standards* (36 C.F.R. § 61).

- **Modified Historic American Building Survey Documentation of the Terminal**

  The City of Ponca City will prepare documentation of the terminal building to meet modified Historic American Building Survey (HABS) Level II standards. The City of Ponca City will create a record of the terminal that includes clear photos, a short-written history, and a description of its important features. This record will follow national historic building documentation standards but will not require detailed architectural drawings.

- **Interpretive Sign/Kiosk**

  To provide education information to the public upon completion of the terminal demolition and for its use within the newly proposed terminal building public space, the City of Ponca City will design and install an interpretive sign detailing the history of the PNC Airport and the current terminal.

- **Ponca City Website Information**

  To provide educational information to the public, the City of Ponca City will create a website documenting the development and history of the PNC Airport and the construction and design of the PNC terminal building and will serve as a digital story map.

IX. AGENCY FINDINGS

The FAA makes the following determinations for this project based upon a careful review of the attached EA, the supporting administrative record, and appropriate supporting information. The FAA weighed both the potential positive and negative consequences that this Proposed Action may have on the quality of the human environment. The FAA has determined that the Proposed Action meets the purpose and need of the proposed project and best implements necessary airfield modifications to meet FAA design standards.

The following determinations are prescribed by the statutory provisions set forth in the Airport and Airway Improvement Act of 1982, as codified in 49 USC §47106 and 47107.

- The FAA has determined the Proposed Action would result in safe and efficient use of U.S. airspace as prescribed in 49 U.S.C. §40103(a).
- The Proposed Action is reasonably necessary for use in air commerce (49 U.S.C.
- §44502(b)). The Proposed Action is reasonably consistent with existing plans of public agencies responsible for development of the area surrounding the airport (49 U.S.C. §47106(a)(1)).
- The interests of the community in or near where the Proposed Action is located have been given fair consideration (49 U.S.C. §47106(b)(2)).

X. DECISION AND ORDER

After careful and thorough consideration of the facts contained herein, the undersigned finds that the proposed Federal action is consistent with existing national environmental policies and objectives as set forth in Section 101 of the National Environmental Policy Act of 1969 (NEPA) and other applicable environmental requirements and will not significantly affect the quality of the human environment or otherwise include any condition requiring any consultation pursuant to section 102(2)(C) of NEPA.

This decision does not constitute a commitment of funds under the Airport Improvement Program (AIP) or Infrastructure Investment and Jobs Act of 2021 (IIJA), Public Law 117-58. However, it does fulfill the environmental prerequisites to approve applications for grants of

AIP or IIJA funds for the proposed project in the future. (49 U.S.C. § 47101)

Accordingly, under the authority delegated to me by the Administrator of the FAA, I approve and direct that agency action be taken to implement the proposed terminal replacement project presented to the FAA by Ponca City Regional Airport. The approved action is specifically described in Part V of this FONSI/ROD and identified in the EA as the Proposed Action. This approval is to be taken under the authority of 49 U.S.C. 40104, 44701, 46110, 47101, and 47122.

D CAMERON BRYAN

Digitally signed by D CAMERON BRYAN
Date: 2026.03.17 14:30:33 -05'00'

D. Cameron Bryan
Deputy Director, Airports Division
Southwest Region

Right of Appeal

This FONSI/ROD constitutes a final order of the FAA Administrator and is subject to the exclusive judicial review under 49 U.S.C. § 46110 by the US Circuit Court of Appeals for the District of Columbia or the US Circuit Court of Appeals for the circuit in which the person contesting the decision resides or has its principal place of business. Any party having substantial interest in this order may apply for review of the decision by filing a petition for review in the appropriate U.S. Court of Appeals no later than 60 days after the order is issued in accordance with the provisions of 49 U.S.C. § 46110.

ENVIRONMENTAL ASSESSMENT

CEQ Unique ID Number: EAXX-021-12-ARP-1752141604

Federal Aviation Administration

Terminal Replacement Project

Ponca City Regional Airport, Ponca City, OK

March 2026

This environmental assessment becomes a Federal document when evaluated, signed, and dated by the Responsible FAA Official.

John MacFarlane
Responsible FAA Official

03/09/2026
Date

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Appendix I – Wild and Scenic Rivers Map
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1.0 INTRODUCTION

This Environmental Assessment (EA) has been prepared in accordance with the National Environmental Policy Act (NEPA) 42 U.S.C. § 4321 et seq, NEPA requires federal agencies to analyze and consider alternatives to the environmental impacts of their proposed actions, to disclose and consider mitigation for those impacts, and to provide interested parties with an opportunity to participate in the environmental review process. Guidance for consideration of environmental impacts is provided in Federal Aviation Administration (FAA) Order 1050.1F[1], Environmental Impacts: Policies and Procedures (FAA, 2015), FAA Order 1050.1F Desk Reference (FAA, 2023), and FAA Order 5050.4B, NEPA Implementing Instructions for Airport Actions (FAA, 2006).

1.1 Background

Ponca City Regional Airport (PNC or Airport) is in Kay County, Oklahoma (132234.9000N, 349559.2000W) primarily serves general aviation operations, and hosts the Northern Oklahoma Flight Academy. **Figure 1** depicts the general vicinity of the Airport. PNC is comprised of one runway, Runway 17-35, 7201 feet x 100 feet, a full-length taxiway, a terminal building, and aircraft parking areas.

The airport also has an air traffic control tower that is integrated into the existing terminal building but has never been utilized. The existing terminal is a 7,326 square foot building with amenities that include a lounge area, a fixed base operator (FBO), and a restaurant. A FBO is a business or service provider located at an airport that offers a range of support services for general aviation (non-airline) aircraft, pilots, and passengers.

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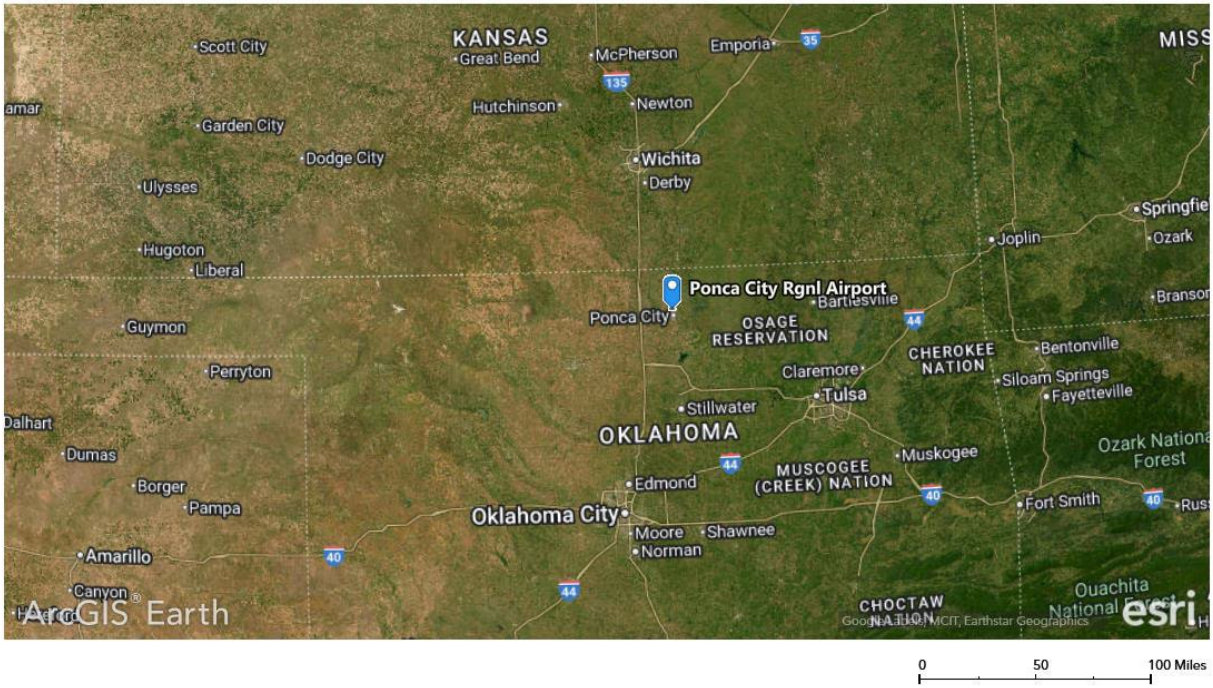
Figure 1 - Vicinity Map



1.2 Proposed Action

PNC is proposing to demolish and replace the existing terminal with a new terminal, expand the apron, and construct a new parking lot. The components of the Proposed Action include:

1. **New Terminal Building**
   - Location & Size: Approximately 14,025 square feet (ft), situated on the east side of the existing apron shown in **Figures 3** and **4**.
   - Construction Details: Steel framing, concrete foundation, glass, and metal exterior panels with modern interior finishes.
   - Inside new terminal building:
     - Airport administrative offices
     - Passenger gates and ticket counters
     - Public restrooms
     - Space for security screening equipment
     - Restaurant

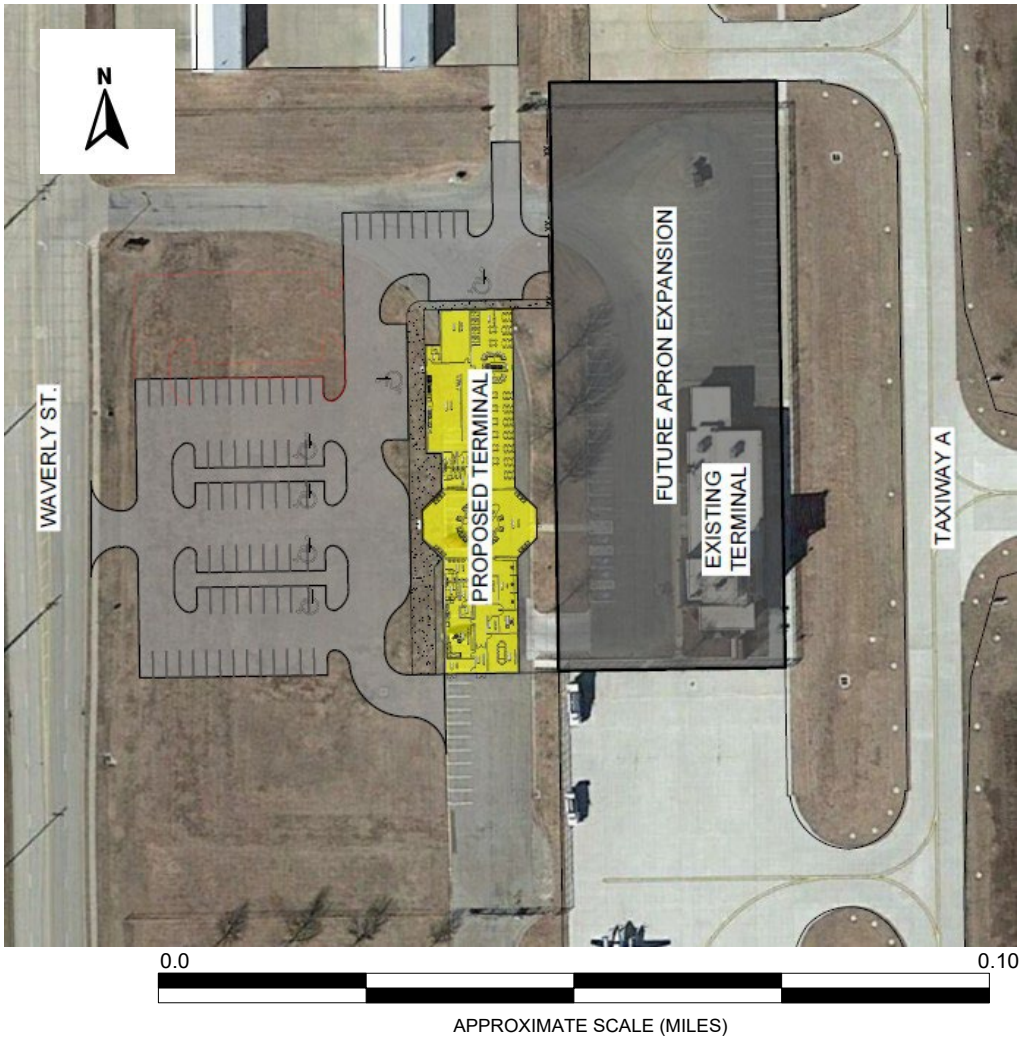
2. **Terminal Parking Lot**
   - Approximately 60,000 square feet paved parking area adjacent to the new terminal to provide convenient access for passengers and staff.

3. **Demolition of Existing Terminal**

4. **Apron Expansion**
    - Expansion of the paved aircraft parking area on the east side of the new terminal to accommodate additional aircraft parking and connect the terminal to air-side operations.

The new terminal would be located west of the current terminal where the current parking lot is located. The new parking lot would be located west of the new terminal. **Figure 2** depicts the footprint of the Proposed Action**.**

Figure 2 – Proposed Action Footprint



1.3 Federal Actions

The federal actions necessary in connection with the Proposed Action include:

1. Determinations under 49 U.S. Code (USC) §§47106 and 47107, relating to the eligibility of the Proposed Action for federal funding under the Airport Improvement Program (AIP) and under Public Law 117-58, Infrastructure Investment and Jobs Act (IIJA)

2. Unconditional approval of the ALP to reflect the Proposed Action as summarized in Section 1.2 of this document.

2.0 PURPOSE & NEED

This chapter describes the purpose and need for the Ponca City Regional Airport Terminal Replacement Project (the Proposed Action). The Proposed Action will take place entirely within the existing airport boundaries.

The airport expanded the primary surface width of the runway from 50 feet to 100 feet. This change on this airfield caused the air traffic control tower, located on top of the existing terminal, to be an obstacle to the Part 77 transitional surface. Therefore, to meet Part 77, the obstruction must be mitigated and/or removed.

2.1 Purpose

The purpose of the Proposed Action is to replace the existing terminal with a new terminal that meets modern operational requirements and removes the airspace obstruction caused by the air traffic control tower.

2.2 Need

The following section describes the need for the project, including deficiencies at the current terminal.

The existing terminal building was constructed in 1952. The current layout and size constrain the airport's ability to meet modern passenger needs and limits potential growth at the airport. In addition, the current aircraft parking apron is deficient.

The existing terminal building is a Part 77 transitional surface obstruction, penetrating the surface by 6 feet, and is therefore a hazard to navigation.

2.2.1 Federal Aviation Administration Part 77 (14 CFR Part 77) Obstruction

14 CFR Part 77 focuses on the safe and efficient use of navigable airspace by establishing standards for determining obstructions to air navigation (FFA 2025c). Federal Aviation Regulation (FAR) Part 77 establishes standards for determining what constitutes an obstruction to air navigation and requires notification to the FAA for certain proposed construction or alterations. Part 77 surfaces are imaginary, invisible zones around airports and runways, defined by their approach classification, that must be kept clear of obstructions. A Part 77 obstruction refers to an object that may affect the national airspace, air navigation facilities, or airport capacity. There are specific height thresholds and proximity limits to different types of airports and roadways that, if exceeded by a proposed structure, are presumed to be a hazard.

In 1992, PNC installed an instrument landing system (ILS). The ILS is a ground-based navigation aid that provides precise guidance to aircraft during the approach and landing phase, especially in low visibility conditions. This converted the runway to a precision instrument runway. A precision instrument runway equips aircraft with an ILS that enables precision approaches, giving pilots both lateral and vertical guidance. These include runway markings and lighting for low visibility, approach lighting systems to assist pilots during final approach, and higher safety standards than non-precision runways. The airport expanded the primary surface width of the runway to 100 feet. This modification made the air traffic control tower, located on top of the terminal, an obstacle to the Part 77 transitional surface. Therefore, to meet Part 77, the obstruction must be mitigated and/or removed.

2.2.2 Terminal Apron Deficiency

The apron east of the existing terminal was removed when Taxiway A was relocated to meet FAA separation requirements between a taxiway and a runway. Therefore, the apron will be expanded to the east to provide sufficient aircraft parking and movement and to ensure direct airside access.

2.2.3 Landside Facilities

The new terminal will be constructed on the existing landside parking lot, therefore, a new parking lot will be constructed to ensure landside access for passengers and visitors.

3.0 ALTERNATIVES

This section describes the Proposed Action and a No Action Alternative, as well as alternatives considered but eliminated from further detailed analysis and the reasons for these decisions. The alternatives under consideration consist of Alternative (A) No Action and Alternative (B) Proposed Action. Alternative (C) Remediate Structural Issues and Recommissioning Building and was eliminated from detailed analysis. It is described in Section 3.3.

3.1 Alternative A – No Action

Inclusion of a No Action Alternative (NAA) in the environmental analysis and documentation is required under FAA Order 1050.1F. The NAA is used to evaluate the effects of not constructing the project, thus, providing a benchmark against which action alternatives may be evaluated. Under the NAA, a new terminal would remain in its current location, the apron would not be expanded, and the parking lot would not be constructed. The existing terminal would remain a Part 77 obstruction and would remain a hazard to air navigation. This alternative does not meet the Purpose and Need of the Proposed Action. There would be no direct environmental impact, the existing terminal would remain at the current location.

3.2 Alternative B – Proposed Action (Preferred Alternative)

PNC proposed the following improvements at the airport.

1. **Construction of a New Terminal Building**
   - **Location & Size:** Approximately 14,025 square feet, situated on the west side of the existing apron shown in **Figure 2.**

   - **Construction Details:** Steel framing, concrete foundation, glass and metal exterior panels with modern interior finishes.

   - **Inside new terminal building:**
     - Airport administrative offices,
     - Passenger gates and ticket counters,
     - Space for security screening equipment,
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2. **Constructing a New Parking Lot**
   - An approximate 60,000 square feet paved parking area adjacent to the new terminal to provide convenient access for passengers and staff.

3. **Demolition of Existing Terminal**

4. **Apron Expansion**
   - Expansion of the paved aircraft parking area on the east side of the new terminal to accommodate additional aircraft parking and connect the terminal to air-side operations.

The new terminal would be located west of the current terminal where the current parking lot is located. The new parking lot would be located west of the new terminal. **Figure 2** depicts the footprint of the Proposed Action**.**

3.3 Alternatives Considered But Eliminated From Detailed Analysis

Alternative C – Remediate Structural Issues and Recommission Building

PNC considered rehabilitating the existing terminal. The current layout and square footage (7,326) of the building does not allow for the space needed for the lounge area, FBO, or the restaurant. The Airport and its tenants require an additional 8,000 square feet to meet the requirements for Alternative C.

The resulting hybrid approach would involve both renovation and expansion, increasing complexity and construction costs. From an operational standpoint, renovation would require temporary or extended closure of the FBO.

The top of the building (the tower) would need to be removed, or the building would need to be moved west to no longer be an obstruction. The structural integrity of the building would come into question with the removal of the top portion of the building. The extensive engineering and design of a remediated Terminal to meet the purpose and need would be cost-prohibitive

With the near-total reconstruction and reconfiguration of the Terminal required to meet the purpose and need of the project, the rehabilitation option would not be a prudent alternative due to the cost and operational delays. Therefore, it is eliminated from further consideration.

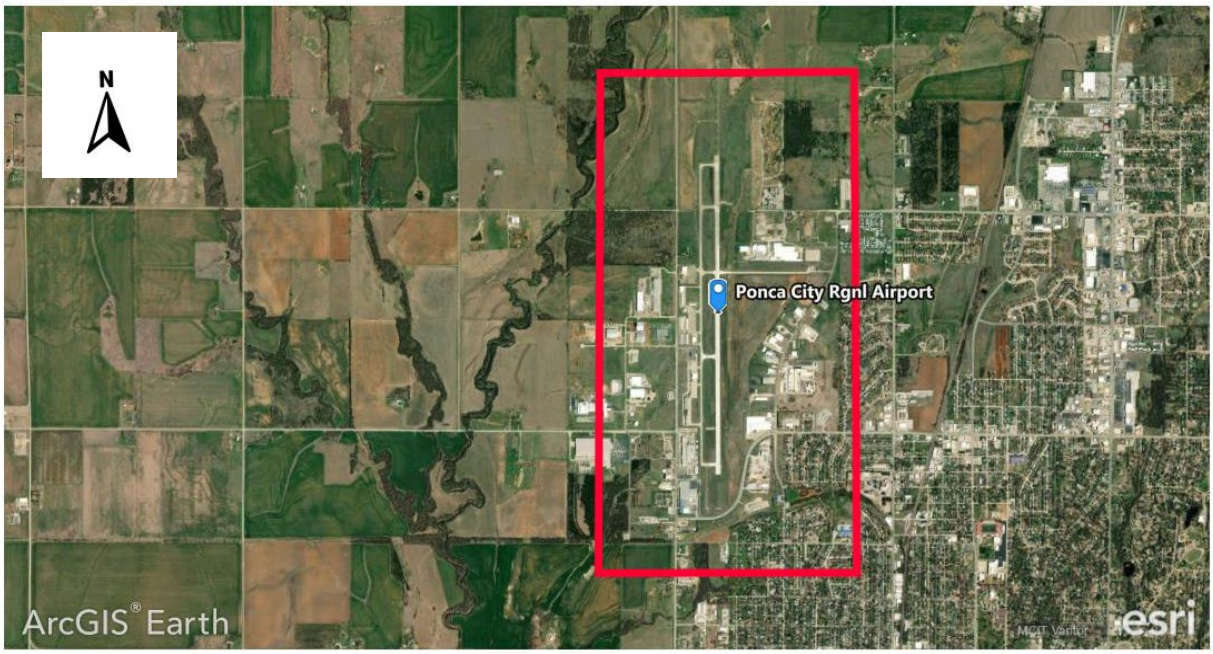
4.0 AFFECTED ENVIRONMENT, ENVIRONMENTAL CONSEQUENCES, AND MITIGATION

The Affected Environment and Environmental Consequences Section defines the existing environment of the current resources that could be affected by the Proposed Action and the No Action Alternative. The potential effects of the Proposed Action and the No Action Alternative are evaluated in this Section. These effects can either be beneficial or adverse to the reference resource. These effects or impacts can vary in terms of the length of time that they may occur and be described as short-term effects or long-term effects. Section 4.0 will describe the impacts that the Proposed Action and the No Action Alternative will have on the resources.

4.1 Study Area

The study area, **Figure 3**, is the defined geographic area where the Proposed Action's environmental impacts are assessed. The study area encompasses all potential direct, indirect, and reasonably foreseeable effects[2] of the Proposed Action.

Figure 3 – Study Area



APPROXIMATE SCALE (MILES)

[2] FAA Order 1050.1F requires consideration of cumulative impacts. In 2023, Congress passed the Fiscal Responsibility Act, which directed agencies to consider "the reasonably foreseeable environmental effects of proposed agency actions" (42 U.S.C. 4332(2)(c). The Council on Environmental Quality (CEQ) has since revoked its regulations (40 CFR parts 1500-1508) implementing NEPA, 42 U.S.C. 4321 et seq., as amended, in response to Executive Order (E.O.) 14154, Unleashing American Energy. In addition, the Supreme Court issued the Seven County Infrastructure Coalition v. Eagle County, 605 U.S. 168 (2025) ruling on May 29, 2025. As a result of these actions, it is no longer a legal requirement or the policy of the federal government to conduct cumulative impact analyses. In addition, the Seven Counties ruling reinforced the limited scope of NEPA reviews, holding that NEPA does not require an agency to consider environmental effects of other activities and projects "separate in time or place" from the proposed action. Therefore, this EA does not include discussion of, or analysis related to, cumulative impacts.

4.2 Resources Eliminated from Further Evaluation

Some resource categories have been eliminated from further evaluation in this EA due to either the absence of the resource within the study area or because activities proposed would not impact baseline conditions of the resource category. Resources not present or affected by implementation of any of the alternatives are listed and discussed in Table 1.

Table 1 – Resources Not Present or with No Anticipated Impact

Resource	Rationale
Climate	The Proposed Action would generate greenhouse gas (GHG) emissions. However, given the short duration and small scope of the construction and demolition processes, any temporary GHG emissions due to construction equipment will be insignificant relative to the emissions of other airport activities. In addition, Kay County is in attainment of all National Ambient Air Quality Standards, therefore, the project does not require a construction emissions inventory.
Coastal Resources	The Proposed Action is in Ponca City, Oklahoma. The Coastal Zone Management Act (CZMA) applies to U.S. coastal states and territories, including those bordering the Great Lakes and the Atlantic, Gulf, and Pacific coasts. Oklahoma is an inland state and does not have a federally approved coastal management program under the CZMA. Therefore, there is no official "Coastal Zone Management Act map" for Oklahoma.
Farmlands	Construction of the Proposed Project would occur entirely on Airport property. No farmland would be acquired or converted as a result of the Proposed Project. Under Section 523(10)(B) of the Farmland Protection Policy Act (FPPA), land that is committed to urban development is not subject to provisions of the FPPA.
Land Use	The Proposed Action is located on Airport property. The Proposed Action will have no impacts on land use and zoning. The Proposed Action will have no affect on land use compatibility (e.g., disruption of communities, relocation, or induced socioeconomic impacts).
Natural Resources and Energy Supply	The Proposed Action will have no impact on natural resources and energy supply. Although the new terminal would increase energy demand from additional lighting systems and signage, the local distribution infrastructure is expected to accommodate an increase in energy demand. In addition, no significant fuel supply impacts are expected with this action, there will only be a temporary increase in fuel consumption during construction. There will be no impacts to natural resources and energy supply due to the Proposed Action.

Resource	Rationale
Socioeconomics, and Children's Environmental Health and Safety	Under the Proposed Action, there would be no relocation of residents or business within or adjacent to the project area with the Proposed Action and no substantial loss in the tax base of any community. In addition, implementation of the Proposed Action would not increase outdoor or indoor air pollutants above ambient levels, pollute any drinking water sources or increase the level of lead contamination adjacent to areas where children are present. In addition, due to restricted access, the Proposed Action would not pose an attractive nuisance hazard that could endanger the health and safety of children. No impact on Socioeconomics or Children's Environmental Health and Safety is expected with the Proposed Action.[3] The Proposed Action will result in no reasonably foreseeable impacts to local and regional economic activity, employment, income, population, housing, public services, traffic, or social conditions.

4.3 Air Quality

4.3.1 Affected Environment

Under the Clean Air Act (CAA), codified as 42 U.S.C. 7401 et seq., the U.S. Environmental Protection Agency (EPA) developed the National Ambient Air Quality Standards (NAAQS) for six common air pollutants. These criteria air pollutants are carbon monoxide (CO), nitrogen dioxide (NO_2), ozone (O_3), particulate matter (PM), sulfur dioxide (SO_2), and lead (Pb). The EPA determined that these criteria air pollutants may harm human health and the environment, and cause property damage. The EPA regulates these pollutants to permissible levels through human health-based (primary standards) and environmental-based (secondary standards) criteria.

The Airport is located in Kay County, Oklahoma which is designated as being in attainment of all NAAQS.

4.3.2. Environmental Consequences

Proposed Action

Construction of the Proposed Action would result in temporary construction related emissions; however, Kay County is in attainment for all NAAQS. Operation of the Proposed Action would not introduce new aircraft or operations to PNC. Because the Study Area is in attainment for all criteria pollutants and the Proposed Action is not subject to general conformity requirements, there would be no effect to air quality.

In the absence of potentially significant effects, mitigation measures are not proposed. Although the Proposed Action would not cause a significant effect to air quality, the construction contractor would conduct construction activities in accordance with FAA Advisory Circular 150/5370-10H, *Standard Specifications for Construction of Airports*. In addition, best management practices (BMPs) would be

[3] FAA Order 1050.1F requires consideration of environmental justice. Executive Orders 12898, 13985, 14091, and 14096 were revoked on January 20, 2025. On January 21, 2025, President Trump issued E.O. 14173, Ending Illegal Discrimination and Restoring Merit-Based Opportunity. In addition, CEQ revoked its regulations (40 CFR parts 1500-1508) implementing NEPA, 42 U.S.C. 4321 et seq., as amended, in response to E.O. 14154. Consequently, it is no longer a legal requirement or the policy of the federal government to conduct environmental justice analyses. As a result, this EA does not include discussion of, or data/analysis related to, environmental justice.

implemented to reduce emissions associated with construction vehicles and equipment during the construction periods.

Reducing equipment emissions include avoiding unnecessary idling of vehicles and machinery, maintain equipment regularly to minimize exhaust emissions, and use low-emission or Tier 4 engines for construction equipment. A Tier 4 engine is a modern diesel engine designed to meet strict EPA standards by reducing harmful exhaust emissions like smoke and soot. In addition, crews will store fine materials such as sand and soil under cover or in enclosed areas and schedule deliveries to reduce traffic congestion and emissions.

BMPs that will be implemented include construction phasing to minimize the amount of disturbed land at any time, watering the construction area to suppress dust and other particulate matter, avoiding unnecessary idling, and utilizing low emissions or Tier 4 construction equipment when available. No long-term air quality effects are anticipated with the Proposed Action.

No Action

Under the No Action Alternative, the Airport would not implement the Proposed Action. PNC would continue to operate and serve forecast aviation demands. Future airport development would be subject to review and approval under the NEPA and is not assumed under this alternative. Therefore, there is no effect to air quality.

4.4 Biological Resources

4.4.1 Affected Environment

Kay county supports an assortment of small mammals, big game, reptiles, amphibians, migratory birds, waterfowl, and aquatic vertebrates. Mammalian wildlife native to Kay County varies from bobcats (*Felis rufus*), whitetail deer (*Odocoileus virginianus)* and blacked-tail jackrabbit *(Lepus californicus)*. Amphibian wildlife varies from toads, salamanders and frogs, such as the American bullfrog *(Lithobates catesbeianus),* southern cricket frog (*Acris gryllus)* and Great Plains Toad *(Anaxyrus cognatus)*. Common reptilians in the area include several species of lizards, turtles, and snakes, including the great plains skink (*Plestiodon obsoletus)*, ornate box turtle (*Terrapene ornata*) and Speckled Kingsnake (*Lampropeltis holbrooki).* Avian species found in Kay County include the house sparrow (*Passer domesticus)* and Cooper's Hawk (*Accipiter cooperii).* Aquatic Vertebrates include largemouth bass (*Micropterus salmoides*), bluefill sunfish (Lepomis *macrochirus*), channel catfish (*lctalurus punctatus*) and crappies (*Pomoxis nigromaculatus*).

The area of the Proposed Action consists of previously disturbed land, including the existing terminal, parking area, and mowed, maintained grass. The Proposed Action would not result in conversion, and / or loss of habitat.

The Endangered Species Act (ESA) of 1973 provides a framework to protect and conserve threatened and endangered species as well as their habitats. Section 7 of the ESA states that "all other Federal agencies shall, in consultation with and with the assistance of the Secretary, utilize their authorities in furtherance of the purposes of this Act by carrying out programs for the conservation of endangered and threatened species listed pursuant to section 4 of this Act (U.S. Fish and Wildlife Service [USFWS], 1973)."

An Information for Planning and Consultation (IPaC) report was generated for the study area found in **Figure 3**. An IPaC species list is a report that is generated from the U.S. Fish and Wildlife Service which identifies federally protected plants and animals that may occur in the study area. The IPaC report showed

four Federally listed endangered or threatened species possibly exist within Kay County, Oklahoma shown in Table 2. The study area associated with the Proposed Action does not contain Federally designated critical habitats (USFWS, 2024e). The IPaC species list is attached in **Appendix A**.

Table 2 – Federally Listed Species with Potential to Occur in the Study Area

Species	Scientific Name	Status	Habitat	Likelihood of Presence
Piping Plover	*Charadrius melodus*	Threatened	Migratory stopover habitat includes sand sprits, small islands, tidal flats, shoals, sandbars with inlets. (USFWS, 2025h)	Not expected. Suitable habitat is not present in the action area.
Rufa Red Knot	*Calidris canutus rufa*	Threatened	Tundra, Coastal area, river or stream, or wetlands (USFWS, 2025i)	Not expected. Suitable habitat is not present in the action area.
Alligator Snapping Turtle	*Macorochelys temminckii*	Proposed Threatened	Large rivers, streams, canals, lakes, and swamps (USFWS, 2025a)	Not expected. Suitable habitat is not present in the action area.
Monarch Butterfly	*Danaus plexippus*	Proposed Threatened	Wetlands, grasslands, coastal land near a shore, mountain areas, rural areas, and urban gardens (USFWS, 2025f)	Not expected. Suitable habitat is not present in the action area.

The USFWS lists one migratory bird species occurring within Kay County (USFWS, 2025e). The Bald Eagle (*Haliaeetus leucocephalus*) is the only migratory bird species that has a potential to breed within Kay County, Oklahoma.

The study area does not include the preferred habitats of threatened and endangered species listed in Table 2 nor are the habitats unique, rare, or protected.

4.4.2 Environmental Consequences

Proposed Action

The implementation of the Proposed Action would have no effect on biological resources because the area of the Proposed Action is heavily disturbed, is maintained on a regular basis, and does not contain critical habitat and preferred habitats of federal- or state-listed species.

No Action

Under the No Action Alternative, the Airport would not implement the Proposed Action. PNC would continue to operate and serve forecast aviation demands. Future airport development would be subject to review and approval under NEPA and is not assumed under this alternative. Therefore, there is no effect to biological resources.

4.5 Department of Transportation Section 4(f)

4.5.1 Affected Environment

Section 4(f) of the Department of Transportation Act of 1966 (DOT Act), (codified as 49 USC Section 303(c)), states that the Secretary of Transportation may approve a transportation project that will use a Section 4(f) property only if there is no feasible and prudent alternative to using that land and only if the program or project includes all possible planning to minimize harm to the resource. The act also protects archeological and historic properties that are eligible or are on the National Register of Historic Places (NRHP) (USGPO, 2011).

Section 4(f) properties are defined as "…any publicly owned land from a public park, recreation area, or wildlife and waterfowl refuge of national, State, or local significance as determined by the Federal, State, or local officials having jurisdiction thereof, or any land from an historic site of national, State, or local significance as so determined by such officials..." (23 USC §138, Preservation of Parklands). To identify probable Section 4(f) resources, historic databases were reviewed for sites which were either listed in the NRHP or were considered eligible for listing in the NRHP. In addition, the study area shown in **Figure 3** was surveyed to determine the presence of previously undocumented historic-age resources that could be considered eligible for listing in the NRHP. There are no public parks, recreation areas, or refuges in the study area.

Historic sites listed in, or eligible for inclusion in, the NRHP are also protected under Section 4(f). The study area contains one Section 4(f) resource, the Ponca City Regional Airport terminal building, which was determined to be eligible for listing on the NRHP. As such, it is considered a historic site of local significance and is protected under Section 4(f). No public parks, recreation areas, wildlife refuges, or additional historic properties were identified within the study area.

4.5.2 Environmental Consequences

Proposed Action

The Proposed Action would demolish the terminal and result in a physical use of the terminal, a structure eligible for listing on the NRHP. Because the Proposed Action proposes to demolish the terminal, an Individual Section 4(f) evaluation is required and was performed. The 4(f) report can be found in **Appendix B**.

As part of the Section 4(f) process, an alternatives analysis conducted on behalf of the Airport, coordinated with the City of Ponca City and FAA, determined there is no feasible and prudent alternative that meets the purpose and need. One other alternative was considered, renovation/relocation - Alternative C. This alternative is discussed in Section 3.3 in the referenced report. The analysis concluded that there is no feasible and prudent alternative to avoid the physical use of the existing terminal.
The U.S. Department of the Interior provided the following Section 4(f) concurrence regarding the Proposed Action:

The Department concurs with the FAA's Draft Individual Section 4(f) Evaluation that there are no prudent and feasible avoidance alternatives for Section 4(f) use of the historic property noted, and that the FAA has adequately planned to minimize harm to the Section 4(f) property. The Department concurs that the proposed project would result in an adverse effect to the existing terminal building, and that this adverse effect results in a permanent physical "use" of the property beyond the de minimis use. Because the FAA, PNC, and the Oklahoma State Historic Preservation Office are entering into a Memorandum of

Agreement in accordance with Section 106 of the National Historic Preservation Act, the Department has no objection to Section 4(f) approval of this project.

A copy of the Department's concurrence letter is provided in **Appendix C**.

No Action

Under the No Action Alternative, no impacts to the existing terminal would occur because no changes would be made to the terminal. The terminal would continue to be a Part 77 obstruction and a hazard to navigation.

4.5.3 Mitigation

Based on the 4(f) analysis, as included in **Appendix B**, there is no feasible and prudent alternative that would meet the purpose and need of the Proposed Action. As a result, a Memorandum of Agreement (MOA) was developed in collaboration between FAA, City of Ponca City, and State Historic Preservation Officer (SHPO – administered thru the Oklahoma Historical Society) to consider and determine mitigation measures for the Proposed Action. Information regarding the MOA process and mitigation is located in Section 4.8.3.

As detailed in the Section 106 documentation (in attachment 5 of the Section 4(f) evaluation in **Appendix B**), mitigation measures include Historic American Buildings Survey, an interpretive sign in the new terminal providing information on the historic aspects of the original terminal, and city website dedicated to telling the story of the original terminal.

4.6 Hazardous Materials, Solid Waste, and Pollution Prevention

Federal actions require consideration of hazardous material, solid waste, and pollution prevention impacts in NEPA documentation.

4.6.1 Affected Environment

4.6.1.1 Hazardous Materials

The EPA Facility Registry Service database (EPA 2025) was reviewed and it showed no solid waste or hazardous waste sites within the study area found in **Figure 4**.

Asbestos-containing materials (ACMs) have been previously abated from the existing terminal and the only ACM remaining in the building is the boiler vent pipe which is an unregulated form of asbestos. No lead-based paint (LBP) testing has been conducted at the PNC terminal; testing will be performed before demolition of the current terminal building.

4.6.1.2 Solid Waste

Solid waste is deposited in the Ponca City Landfill. The landfill has adequate capacity for all solid waste that would be generated by the Proposed Action.

4.6.1.3 Pollution Prevention

The airport accomplishes pollution prevention through the implementation of a site-specific Spill Prevention Control and Countermeasure (SPCC), Industrial Stormwater Pollution Prevention Plan (SWPPP), and individual National Pollution Discharge Elimination System (NPDES) permit.

4.6.2 Environmental Consequences

Proposed Action

Solid waste will be generated by the Proposed Action during construction activities. It will be disposed of at the Ponca City Landfill in accordance with applicable laws. The asbestos vent pipe will be removed and disposed of per applicable local and state laws. Similarly, any LBP will be abated and disposed of before the current terminal is demolished according to local and state laws.

No Action

Under the No Action Alternative, no hazardous materials impacts are expected to occur. However, the asbestos-containing material located in the terminal may become increasingly friable as it persists beyond the lifespan of the material, thus releasing more asbestos fibers into the air and increasing environmental hazards.

4.7 Historical Architectural and Cultural Resources

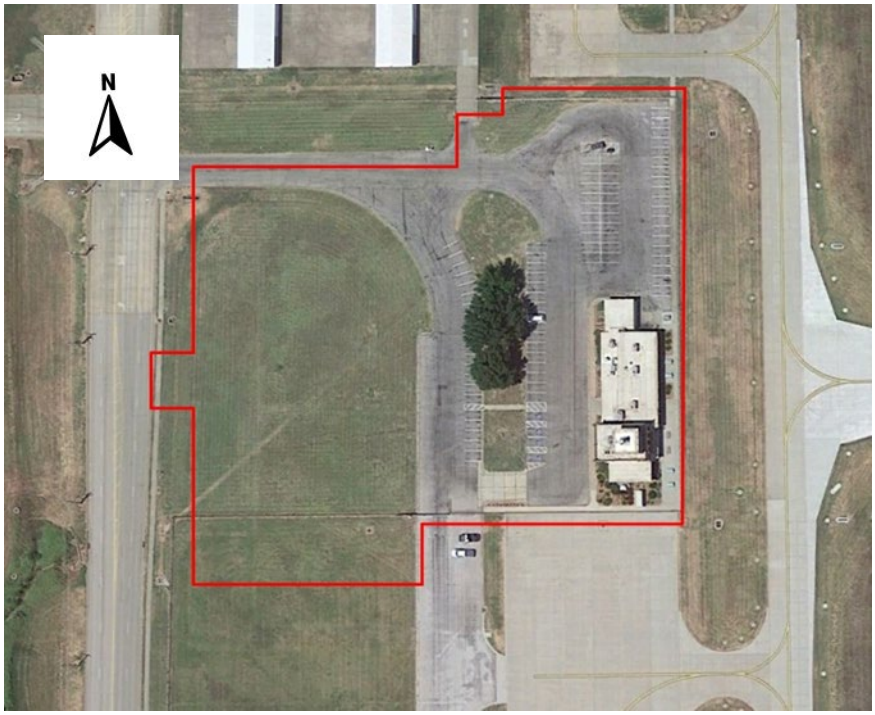
4.7.1 Affected Environment

The National Historic Preservation Act of 1966, Section 106, requires that all federal agencies to consider the impacts of a project on a historic properties and allow the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment on any undertaking that would adversely affect properties eligible for listing in the NRHP before Federal agencies are required to consult with certain parties, such as the State Historic Preservation Office (SHPO) and the Tribal Historic Preservation Office (THPO) of a Federally Recognized Indian Tribe pursuant to Section 1010(d)(2) of the NHPA. Consultation with THPO(s) occurs if an undertaking is occurring on tribal lands or if an undertaking's Area of Potential Effects (APE) is located outside tribal lands but include historic resources of religious and cultural significance to a tribe. The purpose of consultation is to identify potentially affected historic properties, assess effects to such properties, and seek ways to avoid, minimize, or mitigate any adverse effects on such properties. The agency also must provide an opportunity for public involvement (36 CFR § 800.1(a)).

The Area of Potential Effect (APE) is the geographic area(s) within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties (36 CFR 800.16(d)). For purposes of Section 106, the term historic properties can include architectural, archeological, or cultural resources.

FAA sent solicitation letters with APE maps to state and tribal organizations, asking whether the Proposed Action would affect historic or cultural resources. The APE is defined as the area depicted on **Figure 4**. These letters are included in attachment 5 of the Section 4(f) report in **Appendix B**.

Figure 4 – Area of Potential Effect Map



Agencies and tribal organizations that were requested to provide input regarding architectural, archeological, or cultural resources affected by the Proposed Action or within the study area are listed below:

- SHPO – concurred with FAA's adverse effect finding and determined the terminal to be eligible for listing on NRHP
- Oklahoma Archaeological Survey (OAS) – no archaeological field inspection necessary, deferred to SHPO on historical resources
- THPO Apache Tribe of Oklahoma – no response
- THPO Cherokee Nation – no response
- THPO Cheyenne and Arapaho Tribes of Oklahoma – no response
- THPO Kaw Nation, Oklahoma – no response
- THPO Osage Nation – Requested a Phase I Cultural Resources Survey
- THPO Tonkawa Tribe of Indians of Oklahoma – no response
- THPO Wichita and Affiliated Tribes (Wichita, Keechi, Waco & Tawakonie), Oklahoma – no response

The Osage Nation requested a Phase I archeological survey on June 4, 2024. The Archeological Phase I Survey and Report was completed in September 2024 by Afendras Archaeology. The Osage Nation

responded on November 14, 2024, noting the Proposed Action most likely would not adversely affect any sacred properties and/or properties of cultural significance to the Osage Nation. No additional THPOs, tribal organizations, or consulting parties contacted wished to participate in the process or otherwise declined to respond.

On March 29, 2023, the FAA initiated Section 106 consultation with the SHPO, providing a description of the Proposed Action and a Historic Preservation Resource Identification Form (HPRI) Form. The SHPO concurred with the eligibility determination of the Terminal on April 25, 2023, and concurred that the demolition of the terminal would adversely affect the terminal as a NRHP-eligible resource. The SHPO concurred with FAA's determination that the terminal is eligible for listing in the NRHP under Criterion A (Economics) and Criterion C (Architecture) at the local level of significance, citing its association with post-World War II economic development in Ponca City.

Meetings occurred between the FAA, SHPO, the City of Ponca City, and PNC to identify consulting parties and potential stakeholders. Letters and project information were sent via electronic mail to the identified parties on January 25, 2024. SHPO, OAS, FAA, and the Osage Nation were provided with consultation information packets about the Proposed Action and cultural resources within the APE and were invited to participate in the consultation process.

The SHPO directed the FAA to consult with ACHP to complete the Section 106 process. The FAA consulted ACHP on March 18, 2024, regarding the adverse effect determination and NRHP eligibility. On March 27, 2024, ACHP responded that it would decline to participate in the formal consultation or in resolving adverse effects.

At the direction of the FAA, PNC organized a meeting specific to the consulting parties on January 13, 2025. The purpose of the meeting was to discuss 1) purpose and need of the Proposed Action, 2) the potential impacts of the Proposed Action, and 3) potential mitigation options for the identified impacts.

After seeking input from interested consulting parties, a Memorandum of Agreement (MOA) was drafted that details the steps agreed to take to reduce the negative impacts on the terminal. **Appendix D** contains the notification package sent to the ACHP and their response. **Appendix E** includes the meeting agenda and meeting notes. The MOA is included in **Appendix F**. Comments were made regarding mitigation efforts, which were incorporated into the MOA mitigation stipulations. No additional historical, architectural, or cultural resources were identified within the area of the Proposed Action.

4.7.2 Environmental Consequences

Proposed Action

There will be a direct adverse effect on the current terminal. In 2023, the current terminal was determined to be eligible for listing on NRHP. In anticipation of the removal of the current terminal, the City entered into a Memorandum of Agreement (MOA) with the SHPO.

No Action

Under the No Action Alternative, there would be no change in the status of historical, architectural, or cultural resources in the proposed project area.

4.7.3 Historic Properties Mitigation – Memorandum of Agreement

FAA, the City of Ponca City, and the SHPO agree that the project shall be implemented in accordance with the following stipulations to consider the effect of the Proposed Action on historic properties, mitigating the adverse effect on historic properties, and satisfactorily completing FAA's Section 106 responsibilities under the NHPA. Mitigation measures from the resulting MOA are summarized below:

- **Professional Qualification Standards**
  The City of Ponca City will ensure that all actions prescribed by this MOA are carried out by, or under the direct supervision of, qualified professional(s) who meet the appropriate standards in the applicable disciplines as outlined in the *Secretary of the Interior's Professional Qualifications Standards* (36 C.F.R. § 61).

- **Modified Historic American Building Survey Documentation of the Terminal**
  The City of Ponca City will prepare documentation of the PNC Terminal Building to meet modified Historic American Building Survey (HABS) Level II standards. The City of Ponca City will create a record of the terminal that includes clear photos, a short-written history, and a description of its important features. This record will follow national historic building documentation standards but will not require detailed architectural drawings.

- **Interpretive Sign/Kiosk**
  To provide education information to the public upon completion of the terminal demolition and for its use within the newly proposed terminal building public space, the City of Ponca City will design and install an interpretive sign detailing the history of the PNC Airport and the current terminal.

- **Ponca City Website Information**
  To provide educational information to the public, the City of Ponca City will create a website documenting the development and history of the PNC Airport and the construction and design of the PNC terminal building and will serve as a digital story map.

4.8 Noise

The FAA uses land use compatibility guidelines established under 14 Code of Federal Regulations (CFR) Part 150, Airport Noise Compatibility Planning (Part 150). These guidelines are consistent with land use compatibility guidelines developed by other federal agencies such as EPA and the United States Department of Housing and Urban Development. Potential impacts from airport noise, relative to the land uses surrounding an airport, are determined by modeling and mapping the DNL. A noise level of DNL 65 decibels is where noise-sensitive land uses, such as residences, churches, schools, libraries, and nursing homes, become significantly impacted. Below DNL 65, all land uses are determined to be compatible with airport noise (FHA, 2017).

4.8.1 Affected Environment

4.8.1.1 Operational Noise

PNC is comprised of one runway, Runway 17-35, 7201 feet x 100 feet, a full-length taxiway, a terminal building, and aircraft parking areas. The runway is configured in a north/south alignment. The land to the north of the airport is primarily agricultural, while the area to the south is a mix of residential, is a mix of open land, commercial, and low density residential. PNC's operational noise primarily derives from aircraft activities such as takeoffs, landings, taxiing, and engine run-ups. Although no operational noise

contours are available for the airport, the DNL 65 dB contours for general aviation airports of this size and use are typically contained within the airport boundary.

4.8.1.2 Construction Noise

In addition, noise is generated from construction activities. Table 3 depicts an estimate of the typical maximum sound level energy from various types of construction equipment that are likely to be used during construction associated with the Proposed Action. The total sound energy would be a product of a machine's sound level, the number of such machines in service, and the average time they operate.

Table 3: Construction Equipment Noise

Equipment Type	Typical Maximum Sound Level (Lmax) in dB(A) at 50 feet
Dump Truck	76
Concrete Mixer Truck	79
Chain Saw	84
Crane	81
Jackhammer	89
Scraper	84
Man Lift	75
Dozer	82
Tractor	84
Paver	77
Roller	80
Generator	81
Rock Drill	81
Pump	81
Pneumatic Tools	85
Backhoe	78

Source: Federal Highway Administration, *Construction Noise Handbook, 9.0 Construction Equipment Noise Levels and Ranges.* https://www.fhwa.dot.gov/Environment/noise/construction_noise/handbook/handbook09.cfm

4.8.2 Environmental Consequences

Proposed Action

4.8.2.1 Operational Noise

The Proposed Action would not increase the number of existing or forecasted aircraft operations, therefore, aircraft noise conditions would be the same under the No Action and Proposed Action.

4.8.2.2 Construction Noise

This section presents the results of construction noise exposure to surrounding communities as a result of the No Action and the Proposed Action. The analysis of noise and noise compatible land use impacts in this EA is focused on construction related noise.

The FAA's significance threshold for noise considers if the action would increase noise by Day-Night Average Sound Level (DNL) 1.5 decibels (dBA) or more for a noise sensitive area that is exposed to

noise at or above the DNL 65 dB noise exposure level, or that will be exposed at or above the DNL 65 dB level due to a DNL 1.5 dB or greater increase, when compared to the No Action alternative for the same timeframe.

Because the Proposed Action would not increase the number of existing or forecasted aircraft operations, there are no aircraft related changes to noise under the Proposed Action, and the analysis is focused on the potential for construction-related noise impacts. Construction-related noise is a function of the types of equipment being used, the distance to potential receptors, and the duration of construction activities. When noise levels from a point source (such as a construction site) are referenced, they typically include a specified distance from the source, because the intensity of noise decreases over distance from the source. The standard reduction for point source noise (a source that emanates noise spherically, not in a straight line) is 6 dBA per doubling of distance from the source.

When multiple sources of noise are combined (i.e., situations where multiple pieces of construction equipment are operating at the same time) the sound intensities would be combined. However, since dBA is calculated on a logarithmic scale, the sound levels would not add together. In a case where two 85 dBA pneumatic tools are operating simultaneously, the combined sound intensity would not produce a 170 dBA sound level. Rather, two pneumatic tools operating simultaneously (a doubling of sound intensity from just one) would result in an increase of 3 dBA of sound level, or 88 dBA at the source 110 dBA. Likewise, eight pneumatic tools operating simultaneously would result in a sound level of 94 dBA at the source. This concept is illustrated below in Table 4 for use of one, two, and eight pneumatic tools (such as jackhammers, grinders, and air compressors), the loudest type of construction equipment anticipated for the Proposed Action.

Table 4: Example of Noise Reduction Over Distance from Pneumatic Tools (85 dBA)

Distance from Source (feet)	Point Source Noise (from an 85 dBA source)	Point Source Noise (from two 85 dBA source)	Point Source Noise (from eight 85 dBA source)
0	85	88	94
50	79	82	88
100	73	76	82
200	67	70	76
400	61	64	70
800	55	58	64
1,600	49	52	58
3,200	43	46	52

Source: Based on Federal Highway Administration, Construction Noise Handbook and Federal Transit Administration, Transit Noise and Vibration Impact Assessment

The Proposed Action would consist of multiple project components. Construction of the Proposed Action would generate increased noise during construction activities such as demolition, excavation, grading, and structural work. Specific construction equipment and timing are unknown at this time, but the bulk of the proposed work will occur during the weekday, daytime hours. Construction-related noise would vary based on the type of equipment used (see Table 3), and proximity to the construction site (see Table 4). It is likely that multiple activities will occur at once, involving multiple types of construction equipment. To simulate multiple pieces of construction equipment being used at once, the sound levels produced by the simultaneous use of eight of the loudest construction equipment were analyzed. (eight pneumatic tools at 85 dBA each).

The nearest residential neighborhood is located along West Hartford Avenue (between N. Ash Street and N. Union Street). This neighborhood is the closest noise-sensitive land use to PNC. The nearest home is approximately 2,600 feet from the Proposed Action. At this distance, construction-related noise would be reduced by more than 36 dBA due to sound dissipation over distance. With the assumed simultaneous use of eight pneumatic tools, the resulting noise levels from this equipment would be less than 58 dBA at this location, not counting the shielding effect of the buildings located between the Proposed Action and the residential receptors. The sound levels experienced by this neighborhood (between N. Ash Street and N. Union Street) during construction would be below the 65 dBA threshold used by the FAA to determine land use compatibility for residential properties. Additional noise-sensitive land uses (neighborhoods/ parks) are all a farther distance from the Proposed Action and would be below the 65 dBA threshold used by the FAA to determine land use compatibility for residential properties and parks.

The closest residential neighborhood would experience increased noise during construction activities, which could cause temporary conversation interference, activity interference (e.g., reading or watching television), or annoyance. However, based on the distance between the Proposed Action and the nearest receptors, construction noise impacts would not be significant. Therefore, the Proposed Action would not result in significant impacts when compared to the No Action Alternative. The Proposed Action is not an airfield capacity enhancement project and would not cause a change in aircraft-related noise.

No Action

Under the No Action Alternative there would be no change to the noise effects in the area of the Proposed Action. The current noise trends would remain the same.

4.9 Visual Effects

4.9.1 Affected Environment

Using FAA Order 1050.1F and its Environmental Desk Reference, the FAA evaluated the visual character of the Proposed Action. Visual effects refer to how a proposed action's light emissions or alterations to the existing visual environment impact the public's perception of a landscape's character and visual resources and potential negative changes to scenic vistas, historic properties, and the overall aesthetic quality of a location, considering both the introduced visual elements and the affected viewers' experiences. There are currently no special purpose laws or requirements for visual effects. However, visual effects are relevant under Section 106 of the NHPA and Section 4(f).

The Proposed Action is situated at the Ponca City Regional Airport. Existing ambient light in the area of the Proposed Action includes adjacent North Waverly Street and the adjacent airport runway. The airport's viewshed beyond the PNC property is dominated by vacant lots and manufacturing buildings. PNC's property viewshed consists of roadways, parking lots, airport buildings, aprons, and runways with open, scattered lawn.

4.9.2 Environmental Consequences

Proposed Action

The Proposed Action would result in a direct impact to the visual effects of the terminal building by the removal of the existing terminal and construction of the new terminal. These effects are addressed in the Section 4(f) and Historical Architecture sections of this EA, see Section 4.6 and Section 4.8 for more information.

There would also be a short-term increase in light pollution from the increase in vehicle traffic and machinery use during the construction. During the construction, vehicle traffic and equipment operation would increase the amount of light in the area. However, once the construction associated with the Proposed Action is complete, light emissions would decrease.

No Action

Under the No Action Alternative there would be no change to the visual effects in the project area. The current visual trends would remain the same.

4.10 Water Resources (including Wetlands, Floodplains, Surface Waters, Groundwater, and Wild and Scenic Rivers)

Water resources are surface waters and groundwater that are important in providing drinking water and in supporting recreation, transportation and commerce, industry, agriculture, and aquatic ecosystems.

4.10.1 Wetlands

4.10.1.1 Affected Environment

Wetlands are areas where water covers the soil or is present either at or near the surface of the soil all year or for varying periods of time during the year, including during the growing season. Water saturation (hydrology) largely determines how the soil develops and the types of plant and animal communities living in and on the soil. Wetlands may support both aquatic and terrestrial species. The prolonged presence of water creates conditions that favor the growth of specially adapted plants (hydrophytes) and promote the development of characteristic wetland (hydric) soils. (EPA, 2025d). The study area is not located within a wetland. The National Wetland Inventory (NWI) mapper was accessed from the US Fish & Wildlife Service to create a NWI map located in **Appendix G**.

4.10.1.2 Environmental Consequences

Proposed Action

The Proposed Action is located at the Ponca City airport. Desktop analysis and field surveys confirmed that no wetlands are located within the study area found in **Figure 3**. No wetlands are expected to be impacted by this Alternative. The NWI map is located in **Appendix G**.

No Action

If the No Action Alternative is chosen there will be no change in the current conditions for wetlands. Under this alternative wetland trends would say the same.

4.10.2 Floodplains

Executive Order 11988 floodplain management requires that any federal agencies avoid disturbing floodplains unless unavoidable, decrease flood losses and if it unavoidable then mitigate losses. In addition, Federal agencies develop a process that is created upon the 100-year flood standard of the National Flood Insurance Program (NFIP), that evaluates flooding threats and provides consultation and oversite for developing these actions and to enforce these procedures. (FEMA, 2021) The Federal Emergency Management Agency (FEMA) uses the Flood Insurance Rate Maps (FIRM) to find and identify the regulatory 100-year floodplain for the NFIP.

4.10.2.1 Affected Environment

The Proposed Action is located at the Ponca City Airport. A desktop analysis confirmed there are no floodplains located within the study area in **Figure 3**. A FEMA map is located in **Appendix H.**

4.10.2.2 Environmental Consequences

Proposed Action

Based on the FEMA flood Insurance Rate Map, the study area for the new terminal is not located in a floodplain. The Proposed Action will have no impacts on floodplains. FEMA maps are located in **Appendix H**.

No Action

Under the No Action Alternative there would be no change in the current conditions for floodplain in the project area. The current floodplain trends would stay the same.

4.10.3 Surface Waters

4.10.3.1 Affected Environment

The study area in **Figure 3** at PNC does not contain any intermittent streams, perennial streams, pond, wetlands or any surface waters. No surface waters are located at PNC. A NWI map is shown in **Appendix G.**

4.10.3.2 Environmental Consequences

The study area contains no surface waters. The closet river to the study area is Bois D' Arc Creek, which is approximately 0.93 miles west of the study area. Stormwater runoff at PNC is transported through a stormwater sewer system and ditches to nearby natural drainage paths, therefore stormwater would have no effect on streams or any surface waters. In addition, a Construction Stormwater Permit will be obtained before construction will be implemented. There will be no impacts to surface waters associated with the Proposed Action.

4.10.4 Groundwater

4.10.4.1 Affected Environment

The study area is located at the Ponca City Airport and found in **Figure 3.** The North Central Oklahoma Aquifer is situated below the study area. This aquifer is made up of sand and gravel layers beneath the surface, and the water-bearing zone is usually between about 20 and 100 feet deep. The water is generally fresh, with low levels of dissolved minerals, making it suitable for most uses. Wells in this aquifer can produce anywhere from about 20 gallons per minute to over 500 gallons per minute, depending on the location (OWRB, 1997).

4.10.4.2 Environmental Consequences

Proposed Action

The Proposed Action is located within the North-Central Oklahoma aquifer. The depth of construction at PNC will not exceed 10 feet. Therefore, there will be no adverse impacts to groundwater, the North Central Oklahoma Aquifer, or any other aquifers in the area.

The Proposed Action will increase impervious surfaces on the airport by less than 1%. Including the entire recharge basin, the change resulting from the reduction in area for infiltration is much less than 1%. Therefore, the Proposed Action will have a minor impact on groundwater recharge/infiltration.

No Action

Under the No Action Alternative, the Airport would not implement the Proposed Action. Therefore, there will be no impacts to groundwater.

4.10.5 Wild and Scenic Rivers

4.10.5.1 Affected Environment

The Wild and Scenic Rivers Act was passed by congress in 1968, which established the National Wild and Scenic Rivers System to preserve free flowing rivers for the benefit and enjoyment of present and future generations. This Act provides federal protection for certain free-flowing, wild, scenic, and recreation rivers designated as components or potential components of the National Wild and Scenic Rivers System from the effects of construction or development (FSUSDA, 2025).

The study area, found in **Figure 3**, is located at the Ponca City airport. The proposed project location is east adjacent to Waverly Street and is listed zoned P: Public District. No designated wild and scenic rivers are located within the study area. A Wild and Scenic Rivers Map is attached in **Appendix I.**

4.10.5.2 Environmental Consequences

Proposed Action

The Proposed Action is not within proximity of a National Wild and Scenic Rivers System (NWSCRS) river. The project is in compliance with the Wild and Scenic Rivers Act. Wild and Scenic Rivers Map is attached in **Appendix I.**

No Action

Under the No Action Alternative, the Airport would not implement the Proposed Action. There will be no impacts to Wild and Scenic Rivers.

5.0 AGENCY AND TRIBAL COORDINATION AND CONSULTATION

Coordination letters were sent to applicable local, state, and federal agencies and tribal organizations to solicit input regarding potential environmental and cultural resources which could be impacted by the Proposed Action. The agencies consulted during the preparation of this EA are included in Table 5.

Table 5 – Agency and Tribal Coordination and Consultation

Name	Affiliation	Role
Rhonda R. Skrapke	Ponca City Historic Preservation	Participation in consultation
Don L. Nuzum	Ponca City Regional Airport	Participation in consultation – Airport Manager
Kathryn St. Clair	Horizon Environmental Services	Architectural History Manager
Lynda Ozan	Oklahoma Historical Society – State Historic Preservation Office	Deputy State Historic Preservation Officer
Kary Stackelbeck	Oklahoma Archeological Survey	State Archaeologist
Anthony Meave	AIA Eastern Oklahoma Chapter	Architect
Dean Afendras	LJA Environmental Servicies, LLC, dba: Afendras Archeology	Phase I Cultural Resources Survey - Writer
Durell Cooper	Apache Tribe of Oklahoma	Chairman
Bobby Komardley	Apache Tribe of Oklahoma	Chairman
Elizabeth Toombs	Cherokee Nation	Tribal Historic Preservation Officer
Max Bear	Cheyenne and Arapaho Tribes, Oklahoma	Tribal Historic Preservation Officer
Reggie Wassana	Cheyenne and Arapaho Tribes, Oklahoma	Governor
Kimberely Jenkins	Kaw Nation, Oklahoma	Chairwoman
Andrea A. Hunter	Osage Nation	Tribal Historic Preservation Officer - Director
Martin Russell	Tonkawa Tribe of Indians of Oklahoma	President
Lauren Norman-Brown	Tonkawa Tribe of Indians of Oklahoma	Tribal Historic Preservation Officer
Gary McAdams	Wichita and Affiliated Tribes (Wichita, Keechi, Waco & Tawakoni) Oklahoma	Tribal Historic Preservation Officer
Terri Parton	Wichita and Affiliated Tribes (Wichita, Keechi, Waco & Tawakoni) Oklahoma	President
Tori Raines	The Henry and Anna Overholser Mansion Carriage House	Preservation Officer – Executive Director
Rebecca Collins	U.S. Department of the Interior Office of the Secretary Office of Environmental Policy and Compliance	Regional Environmental Officer

6.0 PUBLIC INVOLVMENT

Hard copies of the draft EA were made available for public review at the Ponca City Airport office located at 2231 Waverly Street, Ponca City, OK, and online on the City of Ponca City website (www.poncacityok.gov\airportDEA) for a 30-day period. A Notice of Availability was published in the Ponca City News on January 15, 2026, shown in **Appendix J**. During that 30-day period, a notice affording an opportunity for a public meeting was provided. The public review and comment period concluded on February 14, 2026, and no comments were received. The proof of publication is shown in **Appendix K**.

7.0 PREPARERS AND REVIEWERS

The individuals listed in Table 6 assisted in the preparation of this EA.

Table 6 – Preparers and Reviewers

Name	Affiliation	Role
Derek Blackshare	Blackshare Environmental Solutions – Consultant	Professional engineer – Editor
Whitney Davis	Blackshare Environmental Solutions – Consultant	Environmental Specialist
Tyler McDonald	LBR – Airport Consultant/Engineer	Vice President – grant administrator and Design Engineer

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Appendix A
IPaC Report

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Oklahoma Ecological Services Field Office
9014 East 21st Street
Tulsa, OK 74129-1428
Phone: (918) 581-7458 Fax: (918) 581-7467

In Reply Refer To: 12/03/2025 13:42:17 UTC
Project Code: 2026-0022063
Project Name: PNC General Study Area

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological

evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts, see https://www.fws.gov/program/migratory-bird-permit/what-we-do.

It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures, see https://www.fws.gov/library/collections/threats-birds.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit https://www.fws.gov/partner/council-conservation-migratory-birds.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

- USFWS National Wildlife Refuges and Fish Hatcheries
- Bald & Golden Eagles
- Migratory Birds
- Wetlands

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Oklahoma Ecological Services Field Office
9014 East 21st Street
Tulsa, OK 74129-1428
(918) 581-7458

PROJECT SUMMARY

Project Code: 2026-0022063
Project Name: PNC General Study Area
Project Type: Airport - New Construction
Project Description: Figure 3
Project Location:

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@36.730525,-97.09938885006657,14z

Counties: Kay County, Oklahoma

ENDANGERED SPECIES ACT SPECIES

There is a total of 4 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

BIRDS

NAME	STATUS
Piping Plover *Charadrius melodus* Population: [Atlantic Coast and Northern Great Plains populations] - Wherever found, except those areas where listed as endangered. There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/6039	Threatened
Rufa Red Knot *Calidris canutus rufa* There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/1864	Threatened

REPTILES

NAME	STATUS
Alligator Snapping Turtle *Macrochelys temminckii* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4658	Proposed Threatened

INSECTS

NAME	STATUS
Monarch Butterfly *Danaus plexippus* There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	Proposed Threatened

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the National Wildlife Refuge system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

BALD & GOLDEN EAGLES

Bald and Golden Eagles are protected under the Bald and Golden Eagle Protection Act [2] and the Migratory Bird Treaty Act (MBTA) [1]. Any person or organization who plans or conducts activities that may result in impacts to Bald or Golden Eagles, or their habitats, should follow appropriate regulations and consider implementing appropriate avoidance and minimization measures, as described in the various links on this page.

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1. The Bald and Golden Eagle Protection Act of 1940.
2. The Migratory Birds Treaty Act of 1918.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

There are Bald Eagles and/or Golden Eagles in your project area.

Measures for Proactively Minimizing Eagle Impacts
For information on how to best avoid and minimize disturbance to nesting bald eagles, please review the National Bald Eagle Management Guidelines. You may employ the timing and activity-specific distance recommendations in this document when designing your project/ activity to avoid and minimize eagle impacts. For bald eagle information specific to Alaska, please refer to Bald Eagle Nesting and Sensitivity to Human Activity.

The FWS does not currently have guidelines for avoiding and minimizing disturbance to nesting Golden Eagles. For site-specific recommendations regarding nesting Golden Eagles, please consult with the appropriate Regional Migratory Bird Office or Ecological Services Field Office.

If disturbance or take of eagles cannot be avoided, an incidental take permit may be available to authorize any take that results from, but is not the purpose of, an otherwise lawful activity. For assistance making this determination for Bald Eagles, visit the Do I Need A Permit Tool. For assistance making this determination for golden eagles, please consult with the appropriate Regional Migratory Bird Office or Ecological Services Field Office.

Ensure Your Eagle List is Accurate and Complete
If your project area is in a poorly surveyed area in IPaC, your list may not be complete and you may need to rely on other resources to determine what species may be present (e.g. your local FWS field office, state surveys, your own surveys). Please review the Supplemental Information on Migratory Birds and Eagles, to help you properly interpret the report for your specified location, including determining if there is sufficient data to ensure your list is accurate.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to bald or golden eagles on your list, see the "Probability of Presence Summary" below to see when these bald or golden eagles are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle *Haliaeetus leucocephalus* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Oct 15 to Jul 31

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "Supplemental Information on Migratory Birds and Eagles", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

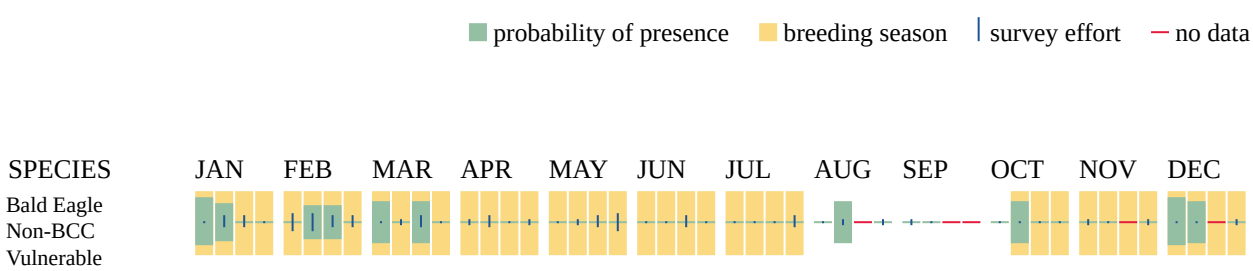
Probability of Presence (▪)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season (▪)
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

Survey Effort (|)
Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (–)
A week is marked as having no data if there were no survey events for that week.



Additional information can be found using the following links:

- Eagle Management https://www.fws.gov/program/eagle-management
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds

- Nationwide avoidance and minimization measures for birds https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf
- Supplemental Information for Migratory Birds and Eagles in IPaC https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action

MIGRATORY BIRDS

The Migratory Bird Treaty Act (MBTA) [1] prohibits the take (including killing, capturing, selling, trading, and transport) of protected migratory bird species without prior authorization by the Department of Interior U.S. Fish and Wildlife Service (Service).

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1. The Migratory Birds Treaty Act of 1918.
2. The Bald and Golden Eagle Protection Act of 1940.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the "Probability of Presence Summary" below to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle *Haliaeetus leucocephalus* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Oct 15 to Jul 31
Chimney Swift *Chaetura pelagica* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9406	Breeds Mar 15 to Aug 25
Lesser Yellowlegs *Tringa flavipes* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9679	Breeds elsewhere
Pectoral Sandpiper *Calidris melanotos* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9561	Breeds elsewhere

NAME	BREEDING SEASON
Red-headed Woodpecker *Melanerpes erythrocephalus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9398	Breeds May 10 to Sep 10
Willet *Tringa semipalmata* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/10669	Breeds Apr 20 to Aug 5

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "Supplemental Information on Migratory Birds and Eagles", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

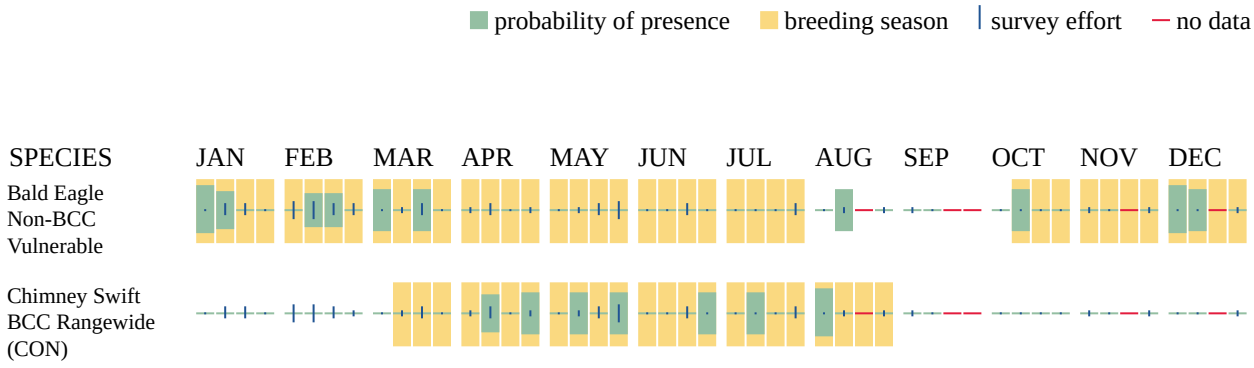
Probability of Presence (■)

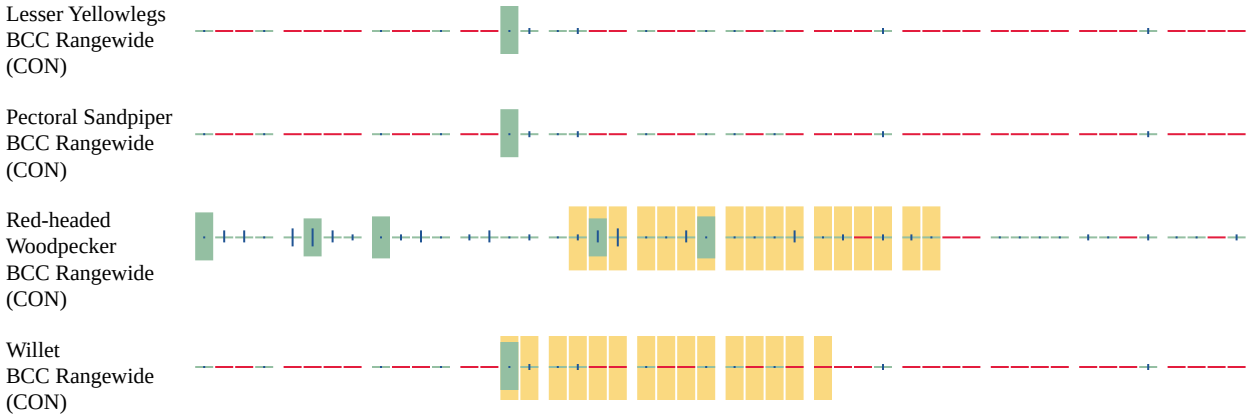
Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season (■)
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

Survey Effort (|)
Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (–)
A week is marked as having no data if there were no survey events for that week.





Additional information can be found using the following links:

- Eagle Management https://www.fws.gov/program/eagle-management
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide avoidance and minimization measures for birds
- Supplemental Information for Migratory Birds and Eagles in IPaC https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action

WETLANDS

Impacts to NWI wetlands and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

RIVERINE

- R5UBF
- R4SBC

FRESHWATER POND

- PUSAh
- PUBF

FRESHWATER FORESTED/SHRUB WETLAND

- PFO1A

FRESHWATER EMERGENT WETLAND

- PEM1A

IPAC USER CONTACT INFORMATION

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City: Tulsa
State: OK
Zip: 74105
Email wdavis@blackshare-env.com
Phone: 9183880970

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Federal Aviation Administration

Appendix B
Section 4(f) Report

US Department of Transportation

Federal Aviation Administration

DOT Section 303(c) Evaluation for the Ponca City Airport Terminal

Ponca City, Oklahoma

This Department of Transportation Section 303(c) Evaluation (Section 4(f) Evaluation) is submitted for review pursuant to the following public law requirements:
Section 102(2)(c) of the National Environmental Policy Act of 1969;
Section 303 of 49 USC, Subtitle I; and
Section 106 of the National Historic Preservation Act of 1966

For Further Information:
John MacFarlane
Environmental Protection Specialist
Federal Aviation Administration
Texas Airports District Office
10101 Hillwood Parkway
Fort Worth, TX 76177

23 July 2025

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ATTACHMENT 1
PROJECT MAP AND VICINITY LOCATION

ATTACHMENT 2
PROPOSED ACTION DESIGN

ATTACHMENT 3
State Historic Preservation Office/Oklahoma Historical Society, Oklahoma Archeological Survey AND
Tribal Historic Preservation Office/TRIBAL ORGANIZATION CORRESPONDANCE

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MEMORANDUM OF AGREEMENT

1.0 INTRODUCTION

Section 303 was initially codified in Title 49 of United States Code (USC) §1653(f) (Section 4(f) of the United States Department of Transportation (US DOT) Act of 1966). In 1983, §1653(f) was reworded and recodified as Title 49 USC §303, but still commonly referred to as Section 4(f). Congress amended Section 4(f) in 2005 when it enacted the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users.

Section 4(f)/303 prohibits the use of land of significant publicly owned parks, recreation areas, wildlife and waterfowl refuges, and historic properties for transportation projects unless the Federal Aviation Administration (FAA) determines that there are no feasible and prudent avoidance alternatives and that all possible planning to minimize harm has occurred.

The FAA is considering a request by the City of Ponca City (City) to demolish the terminal building (the Terminal) at Ponca City Municipal Airport (PNC) (the Airport), which is in an advanced stage of deterioration. In 2023, the Terminal was recommended eligible for listing In the National Register of Historic Places (NRHP) by the Oklahoma Historical Society (OHS), which assumes the role of State Historic Preservation Officer (SHPO), and is therefore considered a Section 4(f) resource. No other Section 4(f) resources are present at the site. The new terminal building is intended to meet existing and future needs at PNC as well as increasing passenger/crew capacity.

1.1 EXISTING AIRPORT ENVIRONS AND THE AREA OF POTENTIAL EFFECT (APE)

The Airport is a public use airport that is owned and operated by the City and serves both private and major commercial airlines. The Airport is located at 2231 Waverly Street in Ponca City, Kay County, Oklahoma. PNC was established in 1930 and spans over 500 acres. The Terminal was constructed in 1953 and designed by William R. Brown in the Modern style. The PNC includes the NRHP-listed Airport Brick Hangar constructed in 1930 and the NRHP-listed West Hangar constructed in 1942 (OHS 2024). The PNC includes a 7,201-foot concrete runway that serves air traffic, the Terminal, and additional facilities and utilities (see **Attachment 1** for Project Location Map).

The Area of Potential Effect (APE) is defined by the National Park Service (NPS) as "the geographic area where a project could potentially affect historic properties." Historic properties in this context are considered properties determined eligible for listing, or listed, in the NRHP. The APE for the proposed PNC project is considered the Proposed Action footprint, which includes the Terminal, apron expansion area, and parking lot area (See **Attachment 2**).

The objective of the Proposed Action is to remove the existing terminal building and design and construct a new, larger terminal building west of the existing terminal where the current parking lot is located. The project would include the construction of a new parking lot west of the new terminal and improvements to the apron on the east side of the terminal.

1.2 PURPOSE AND NEED

According to the FAA Order 1050.1F, Section 6-2.1(c), the Purpose and Need briefly describes the underlying purpose and need for the Federal Action and provides the foundation for identifying reasonable alternatives to the Proposed Action. The Purpose and Need identifies the problem facing the airport sponsor (i.e., the "need" for the action) and the proposed solution (i.e., the "purpose" of the action).

Federal Aviation Administration Part 77 (14 CFR Part 77) focuses on the safe and efficient use of navigable airspace by establishing standards for determining obstructions to air navigation (FFA 2025c). Federal Aviation Regulation (FAR) Part 77 establishes standards for determining what constitutes an obstruction to air navigation and requires notification to the FAA for certain proposed construction or alterations. Part 77 surfaces are imaginary, invisible zones around airports and runways, defined by their approach classification, that must be kept clear of obstructions. A Part 77 obstruction refers to an object that may affect the national airspace, air navigation facilities, or airport capacity. There are specific height thresholds and proximity limits to different types of airports and roadways that, if exceeded by a proposed structure, are presumed to be a hazard.

In 1992, construction was completed for an instrument landing system to be installed at PNC. This converted the runway to a precision instrument runway. The primary surface width increased from 500 ft to 1000 ft, causing the top portion of the terminal, which is actually the air traffic control tower, to become an obstruction to the Part 77 transitional surface.

1.2.1 Purpose

The purpose of the Proposed Action is to provide PNC with a modern terminal building that will incorporate FAA airport design standards and recommendations (FAA AC No: 150/5300-13B) for the betterment of safety, efficiency, and capacity. Construction of the new terminal will correct the 14 CFR Part 77 for safe, efficient use, preservation of the navigable airspace (Part 77) encroachment and expand the apron east of the new terminal to connect it to airside operations.

1.2.2 Need

The current terminal building was constructed in 1952 and is outdated and inefficient, and is a Part 77 transitional surface obstruction penetrating the surface by 6 feet, and is therefore a hazard to navigation.

In addition, when Taxiway A was relocated in 2010 per FAA separation requirements, the apron directly in front of the terminal was removed. Because the new terminal will be west of the existing terminal, apron expansion to the east is necessary to connect and allow airside access to the new terminal.

2.0 IDENTIFYING DOT SECTION 4(F) RESOURCES

DOT Section 4(f) lands are defined as "…any publicly owned land from a public park, recreation area, or wildlife and waterfowl refuge of national, State, or local significance as determined by the Federal, State, or local officials having jurisdiction thereof, or any land from an historic site of national, State, or local significance as so determined by such officials..." (23 USC §138, Preservation of Parklands). To identify probable DOT Section 4(f) resources, historic databases were reviewed for sites which were either listed in the NRHP or were considered eligible for listing in the NRHP. In addition, the APE was surveyed to determine the presence of previously undocumented historic-age resources that could be considered eligible for listing in the NRHP. According to Section 4(f) requirements, an historic site is significant only if the site is listed on or eligible for listing on the NRHP. The OHS, Oklahoma Archeological Survey (OAS), Tribal Historic Preservation Offices (THPO), and Tribal Organizations were consulted to aid in the identification of Section 4(f) resources. The Terminal was found to be eligible for listing on the NRHP by the OHS (the SHPO) in 2023. No additional Section 4(f) resources were identified within the APE. In addition, an archeological survey of the APE was conducted, and a finding of "no archeological materials are likely present" was made by the Osage Nation Historic Preservation Office (See Attachment 3 for Agency Correspondence).

2.1 BACKGROUND RESEARCH

Established in 1930, the Ponca City Municipal Airport Complex served the Ponca City community during the first oil and population boom period and throughout World War II. The complex includes two NRHP-listed buildings, hangars constructed in 1930 and 1942, respectively. The hangars and original airfield remain on the airport complex property.

The PNC was constructed in the post-World War II period when the City was experiencing a period of rapid growth fueled by the success of the oil and gas industry. In addition to a new, modern terminal, a drive-in theater, numerous residential neighborhoods, and civic and commercial buildings were constructed in the community during this period. Though the airport was already established in the 1930s, the City did not have a terminal building to host the influx in people moving to the area and business travelers. The terminal was constructed as a result of the booming local economy and designed in the Modern architectural style, which provided an opportunity to express the technological advancements and optimism of the city (Denson 2024).

2.2 DESCRIPTION OF THE PONCA CITY AIRPORT TERMINAL

The PNC terminal building was constructed in 1953, and designed by William R. Brown, a locally prominent architect who also designed the NRHP-listed Ponca City Power Plant and the NRHP-listed First Presbyterian Church. The mid-century modern building exhibits features of the International and Art Deco styles and was constructed during a period of economic growth in the community. The SHPO determined the terminal eligible for listing in the NRHP under Criterion A in the historical significance area of economics, and Criterion C in the historical significance area of architecture. The

terminal is significant on the local level for its association with the post-World War II economic development of Ponca City. The period of significance is considered 1953, which corresponds to the terminal's year of construction.

3.0 ALTERNATIVE ANALYSIS

Per DOT guidance, each DOT Section 4(f) resource is evaluated for potential impacts associated with each of the alternatives considered, including a no-build option. The potential impact criteria evaluated for each site include direct impacts and constructive use impacts.

Direct impacts, or physical “use,” refer to physical taking/acquisition of a Section 4(f) resource for incorporation into a transportation project. In determining direct impacts, each proposed alternative was evaluated to determine if the alternative would impact one of the identified Section 4(f) resources. The term “use” within the context of Section 4(f) includes not only actual physical taking of such resources, but also indirect impacts as well. Indirect impacts may rise to the level of a "use" termed "constructive use" if, due to the proximity of the project, the activities, features, or attributes of the site's vital functions are substantially impaired. The definition of “constructive use” adopted for this study is based on FAA Order 1050.1F, Exhibit 4-1 (Significance Determination for FAA Actions):

> *Substantial impairment occurs when the activities, features, or attributes of the resource that contribute to its significance or enjoyment are substantially diminished.*

3.1 DOT SECTION 4(F) FEASIBLE AND PRUDENT REQUIREMENTS

Programs or projects requiring the use of Section 4(f) lands will not be approved by the FAA unless there is no prudent and feasible alternative to the use of such land, and such programs and projects include all possible planning to minimize harm resulting from the use. The term "feasible" refers to sound engineering principles, while the term "prudent" refers to rationale judgment. According to FAA Order 5050.4B, a project may be possible (feasible), but not rational when one considers safety, policy, environmental, social, or economic consequences. The following factors are to be used to decide if an alternative is prudent (FAA Order 5050.4B, NEPA Implementing Instructions for Airport Actions, 10:10):

- Does it meet the project's purpose and need?
- Does it cause extraordinary safety or operational problems?
- Are there unique problems or truly unusual factors present with the alternative?
- Does it cause unacceptable and severe adverse social, economic, or environmental impacts?
- Does it cause extraordinary community disruptions?
- Does it cause additional construction, maintenance, or operational costs of an extraordinary magnitude?
- Does it result in accumulation of factors that collectively, rather than individually, have adverse impacts that present unique problems or reach extraordinary magnitudes?

3.2 ALTERNATIVES

In determining impacts, each proposed alternative was evaluated to determine if the alternative would directly/indirectly impact a Section 4(f) resource.

3.2.1 Alternative 1: No Action Alternative

Under the No Action Alternative, a new terminal would not be constructed at PNC. The existing terminal would remain in use at current capacity and out of compliance as a FAA Part 77 obstruction.

3.2.2 Alternative 2: Remediate Structural Issues and Recommission Building

Rehabilitation of the current terminal facility was considered. The current layout and square footage (7,326) of the building does not allow for the space needed. PNC serves a growing population within the Ponca City region and is currently exceeding capacity and can no longer efficiently serve air transit needs. Expansion of the lounge area and FBO area would require substantial renovation and additions.

The existing terminal cannot accommodate the space needed for modern Fixed Base Operator (FBO) services, pilot amenities, or restaurant functions. To meet the programmatic needs of the Airport and its tenants, an additional 8,000 SF of new construction would be required. The resulting hybrid approach would involve both renovation and expansion, increasing complexity and construction costs.

From an operational standpoint, renovation would require temporary or extended closure of the FBO and Enrique's restaurant, both of which have active customer bases. Renovation of the existing building would further trigger the need for significant upgrades to meet current building codes, American Disabilities Act (ADA) standards, and energy efficiency requirements.

The current terminal also meets the definition of an FAA Part 77 obstruction. Ponca City Regional Airport is a D-II category airport with precision instrument approach. The existing terminal building has a top elevation of 1011.4'. The transitional surface elevation at that point is 1,005.1', making the current terminal a 6.3' obstruction. The top of the building (the tower) would need to be removed, or the building would need to be moved west to no longer be an obstruction. The structural integrity of the building would be compromised with the removal of the top portion of the building. The existing site also limits aircraft access and apron visibility. A new terminal allows for repositioning the building so that planes can park directly in front of the entrance, improving safety, convenience, and alignment with the airport's long-term development plan.

The following additional obstacles further limit the feasibility of rehabilitation:

- Phasing and Safety Logistics: Working within a partially occupied building creates safety risks and phasing delays. Construction would need to be staged around ongoing airport operations, leading to extended timelines and higher labor costs.
- Mechanical, Electrical and Plumbing (MEP) Infrastructure Deficiencies: The current building likely lacks sufficient HVAC capacity, electrical service, and plumbing to meet modern restaurant and aviation program demands. System upgrades may require trenching, utility service increases, and code-compliant commercial kitchen systems.
- Hazardous Materials: Given the age of the facility, asbestos, lead paint, or mold may be present. Abatement would add cost, delay, and permitting requirements.

- Commercial Kitchen Compliance: A new or updated restaurant kitchen would require Type I exhaust hoods, ductwork, and fire-rated separations, which are unlikely to be accommodated in the existing footprint without substantial disruption.
- Code-Driven Accessibility Upgrades: ADA-compliant restrooms, wider circulation paths, accessible entries, and parking modifications would all be required.
- Structural & Envelope Modernization: Roof and wall systems would likely require reinforcement to meet modern seismic and wind-load codes.
- Parking & Site Circulation Constraints: The current site layout limits passenger and delivery access, whereas new construction allows for redesigning of vehicular circulation and ADA parking areas.

The rough cost estimates for work that would be required under this alternative are summarized in Table 1 below.

Table 1: **Cost Estimates for Alternative 2**

Item	**Estimated Cost**
Geotechnical Investigations and Forensic Testing	$40,000
Lidar Survey & As-Built Documentation of Building and Site	$50,000
Reverse Engineering of Existing Building	$250,000
Structural Analysis & Design to Re-Support Roof After Tower Removal	$150,000
Selective Demolition (Interior + Tower Removal – 4,000 SF @ ~$45/SF)	$180,000
Temporary Falsework and Safety Protection Measures	$200,000
Higher Design Fee for Renovation Programming, Documentation, and Expansion Fit	$500,000
Renovation of Existing Terminal Interior & Envelope (7,326 SF@ $340/SF)	$2,500,000
Code, ADA, and Energy Efficiency Compliance Upgrades	$300,000
New Construction Addition (8,000 SF @ $814/SF)	$6,512,000
Temporary Facility Costs (FBO & Restaurant Rental + Setup)	$250,000
Professional Services During Construction (Testing, Observation)	$500,000
Asbestos Remediation (Vent Pipe)	$12,000
Total Cost	$11,444,000

Note: *The planning-level opinion of probable cost reflects preliminary estimates based on comparable project benchmarks, general industry standards, and assumed conditions (WT Architects 2025).*

Remediating the Terminal is not considered a feasible and prudent option based on safety concerns related to the obstruction as well as the building position with the runways present. Overall, the current structure size and layout presents substantial spatial, structural, operational, and hazardous material (asbestos, lead) abatement and/or remediation and regulatory limitations that rehabilitation are impractical and cost prohibitive.

The extensive engineering and design of a remediated Terminal to meet the purpose and need would not only be cost-prohibitive, but would adversely affect the historic Terminal, as character-defining features would be compromised. There is not a feasible rehabilitation alternative that meets the purpose and need that would also retain character-defining features (i.e., the control tower) to a degree where the rehabilitated terminal would continue to convey historical integrity. This Alternative would result in a physical use of the Section 4(f) property based on the extensive engineering and design alterations anticipated for a rehabilitation.

With the near-total reconstruction and reconfiguration of the Terminal required to meet the purpose and need of the project, the rehabilitation option would not be a prudent alternative due to the cost and operational delays and interference and would still result in an adverse effect to the historic resource.

3.2.3 Alternative 3: Demolition of Existing Terminal and Construction of New Building

Alternative 3 is the proposed action, which is the preferred alternative for PNC. The new terminal would be located west of the current terminal, where the current parking lot is located. The new parking lot will be located west of the new terminal (see Attachment 2).

This alternative includes building a new larger and updated terminal, constructing a new parking lot for the terminal, demolishing the current terminal and making apron improvements on the east side of the new terminal.

The proposed terminal would be 14,025 square feet and house new airport administrative offices, gates and ticket counters, public restrooms, an area for security equipment, and a restaurant. This proposed alternative would comply with the FAA's airport standards (FAA AC No: 150/5300-13B) for the improvement of efficiency, security, and capacity, and correct the FAA Part 77 encroachment. The new terminal would have a capacity of 533 people. This alternative includes constructing a new parking lot to serve increasing parking needs and making apron improvements on the east side of the new terminal. The new parking lot, accessed from Waverly Street, would be approximately 1.1 acres in size and would have approximately 140 parking spaces. The apron improvements would tie in the new terminal to the airfield side of the airport. The proposed action would provide a development area for future apron expansion, improve access to the airport, and improve the indoor environment for occupants while meeting current FAA design standards. This alternative would result in a physical use of the Terminal building. However, this alternative (demolition of the terminal) is considered the most feasible and prudent alternative based on reducing the safety hazards and reducing the cost burden to the City.

The Construction Manager At Risk (CMAR) for the project has estimated the total construction cost for the project at $11,977,469. The engineering and architectural costs are estimated at $942,325. The total cost of the project is estimated at $12,919,794.

The cost estimation for both Alternative 2 and 3 are relatively close in value, though both would result in adverse effects to the historic resource.

4.0 COORDINATION

The FAA implemented a public involvement and agency coordination program for the proposed project to gather input and discuss potential impacts.

4.1 AGENCY AND TRIBAL COORDINATION AND CONSULTATION

Meetings occurred between the staff of the FAA, the SHPO, the City, and PNC to identify consulting parties and potential stakeholders. Letters and project information were sent via electronic mail to the identified parties on January 25, 2024. Parties were provided with consultation information packets about the Proposed Action and cultural resources within the APE and were invited to participate in the consultation process. Parties identified and invited to the consultation process include:

- Advisory Council of Historic Preservation (ACHP)
- SHPO: OHS and the OAS
- Tribal Organizations: Apache Tribe of Oklahoma, the Arapaho and Cheyenne Tribes THPO, Osage Nation THPO, Chickasaw Nation, Tonkawa Tribe of Indians of Oklahoma THPO, Wichita and Affiliated Tribes THPO,
- Interest Groups: The City of Ponca City, Ponca City Historic Preservation, Preservation Oklahoma, American Institute of Architects (Central OK and Eastern OK Chapters)

Per the guidance of the SHPO, the Advisory Council of Historic Preservation (ACHP) was notified of the adverse effects to the Terminal on March 18, 2024. The ACHP responded on March 27, 2024 with a default decision to decline intervention or comment in the process; however, the ACHP did express a willingness to reconsider this decision at the invitation of the SHPO, THPO, tribal organization, or consulting party.

The OHS (SHPO) concurred with the eligibility determination of the Terminal on April 25, 2023, and concurred that the demolition of the Terminal would adversely affect the Terminal as an NRHP-eligible Section 4(f) resource. The SHPO agreed to participate in the consultation process in a letter dated February 7, 2024. The OAS responded on February 2, 2024 that no archaeological materials are likely to be encountered during the proposed project and did not request an archeological field inspection.

An Archeological Phase I Survey and Report was completed at the request of the Osage Nation. The Osage Nation responded on November 14, 2024, noting the proposed project most likely would not adversely affect any sacred properties and/or properties of cultural significance to the Osage Nation. No additional THPOs, tribal organizations, or consulting parties contacted wished to participate in the process or otherwise declined to respond.

The City of Ponca City is an on-going participant in the project coordination and consultation, as the project sponsor. No interest groups responded to the request to participate in the consultation process.

A meeting specific to the consulting parties occurred on January 13, 2025. The purpose of the meeting was to discuss 1) the reasons for the proposed project, 2) the potential impacts of the proposed project, and 3) potential mitigation options for the identified impacts. After seeking input from interested consulting parties, a Memorandum of Agreement (MOA) was drafted to outline mitigation measures that concurring parties agreed were appropriate to mitigate adverse effects on the Terminal. Attachment 3 contains correspondence and findings. Attachment 4 contains the notification package sent to the ACHP and their response. Attachment 5 includes the meeting agenda and meeting notes. The MOA is included in Attachment 6. No comments regarding the Proposed Action were made during the meeting. Comments were made regarding mitigation efforts, which were incorporated into the MOA mitigation stipulations.

4.2 COORDINATION WITH THE PUBLIC

A Notice Affording an Opportunity for Public Meeting is anticipated to be published in 2025 once the draft Environmental Assessment (EA) document has been reviewed and approved by the FAA for circulation. The draft EA will be published for a 30-day period to solicit comments from the public, which will include drafts of the MOA and this 4(f) document. In addition, a notice in the newspaper and on the City of Ponca City's website will be posted If anyone requests a public meeting, the FAA will hold one at that time.

5.0 FINDINGS

After careful and thorough consideration, the FAA determined that there are no feasible and prudent alternatives to the use of Section 4(f) resource.

5.1 ALTERNATIVE 1: NO ACTION

• Adverse Effect: No adverse effect.

• Suitability to Purpose and Need: This alternative would retain the Terminal in place. It would not meet the purpose and need of the proposed project as it would not address the safety concerns presented by the position and size of the Terminal.

• This alternative is not prudent or feasible. This alternative does not meet the purpose and need and presents extraordinary safety and operational problems. This alternative may have a negative economic impact on the Airport because of the limited capacity and efficiency of the current terminal. Due to the Part 77 encroachment creating unsafe conditions and the proximity to other occupied structures and the runway, the abandon-in-place option is not viable, as it risks life and property.

• Conclusion: This alternative would not result in an adverse effect to historic properties under Section 106 but is not prudent nor feasible as it does not meet the purpose and need of the proposed project.

5.2 ALTERNATIVE 2: REHABILITATION

• Adverse Effect: Impacts to integrity of design, materials, workmanship, and feeling necessitated by remediation would result in an adverse effect to the Terminal.

• Suitability to Purpose and Need: This alternative would retain the Terminal in place, though it would be substantially modified. It would meet the purpose and need of the project.

• This alternative is not prudent nor feasible. This alternative would require extensive additional engineering and design of multiple spaces and removal of the tower that would be cost-prohibitive and result in an adverse effect to a historic property. Collectively, the factors presented by this alternative have adverse impacts that present unique problems and reach extraordinary magnitudes.

• Conclusion: This alternative, while meeting the purpose and need of the proposed project (Proposed Action), is not prudent nor feasible as outlined above.

5.3 DEMOLITION OF EXISTING TERMINAL AND RECONSTRUCTION OF NEW TERMINAL

• Adverse Effect: The demolition of the Terminal would result in an adverse effect.

• Suitability to Purpose and Need: This alternative would replace the existing Terminal with a larger building more suitable to current capacity and functional needs. It would also provide a new building that complies with 14 CFR Part 77. It would meet the purpose and need of the project.

• This alternative is prudent and feasible. This alternative, while resulting in an adverse effect under Section 106, would not otherwise result in a collection of factors that present unique problems or reach extraordinary magnitudes. The demolition and construction of a new terminal in compliance with regulatory requirements, including 14 CFR Part 77 while providing larger occupancy space can be accomplished at a reasonable cost.

• Conclusion: This alternative meets the purpose and need of the of the proposed project (Action) and is prudent and feasible. The adverse effect can be mitigated through the Section 106 process, as outlined in the MOA.

5.4 PREFERRED ALTERNATIVE

As demonstrated in Section Five of this evaluation, other alternatives considered would either fail to meet the purpose and need or result in extraordinary financial impacts. Alternative 3, the Proposed Action, includes mitigation to resolve adverse effects and to appropriately document the structure for airport users and for the general public. Mitigation measures are documented in the MOA, which was prepared in compliance with Section 106 of the NHPA (36 CFR Part 800) regulations. Based upon the above considerations, there is no feasible and prudent alternative to the use of the Terminal and the Proposed Action includes all possible planning to minimize harm resulting from such use.

6.0 REFERENCES CITED

Denson, Paula Carmack

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Federal Aviation Administration (FAA)

2025a Order 1050.1F-Environmental Policies and Procedures. https://www.faa.gov/documentlibrary/media/order/faa_order_1050_1f.pdf. Accessed February 10, 2025.

2025b Advisory Circular. AC 150/5300-13B - airport design. https://www.faa.gov/airports/resources/advisory_circulars/index.cfm/go/document.current/documentnumber/150_5300-13. Accessed February 8, 2025.

2025c Notification of Proposed Construction or Alteration on Airport Part 77. Central Regional Airports Division. https://www.faa.gov/airports/central/engineering/part77. Accessed March 20, 2025.

2025d Terminal Area Forecast (TAF). https://www.faa.gov/data_research/aviation/taf#:~:text=The%20Terminal%20Area%20Forecast%20(%20TAF,%2C%20and%20non%2Dtowered%20airports. Accessed February 10, 2025.

2025 Order 5050.4B, National Environmental Policy Act Implementing Instructions for Airport Actions, 10:10. https://www.faa.gov/documentLibrary/media/Order/5050.4B.pdf. Accessed March 10, 2025.

Oklahoma Historical Society (OHS)

2024 Oklahoma National Register of Historic Places. http://nr2_shpo.okstate.edu/QueryData.aspx. Accessed November 11, 2024.

Wilson, Linda D.

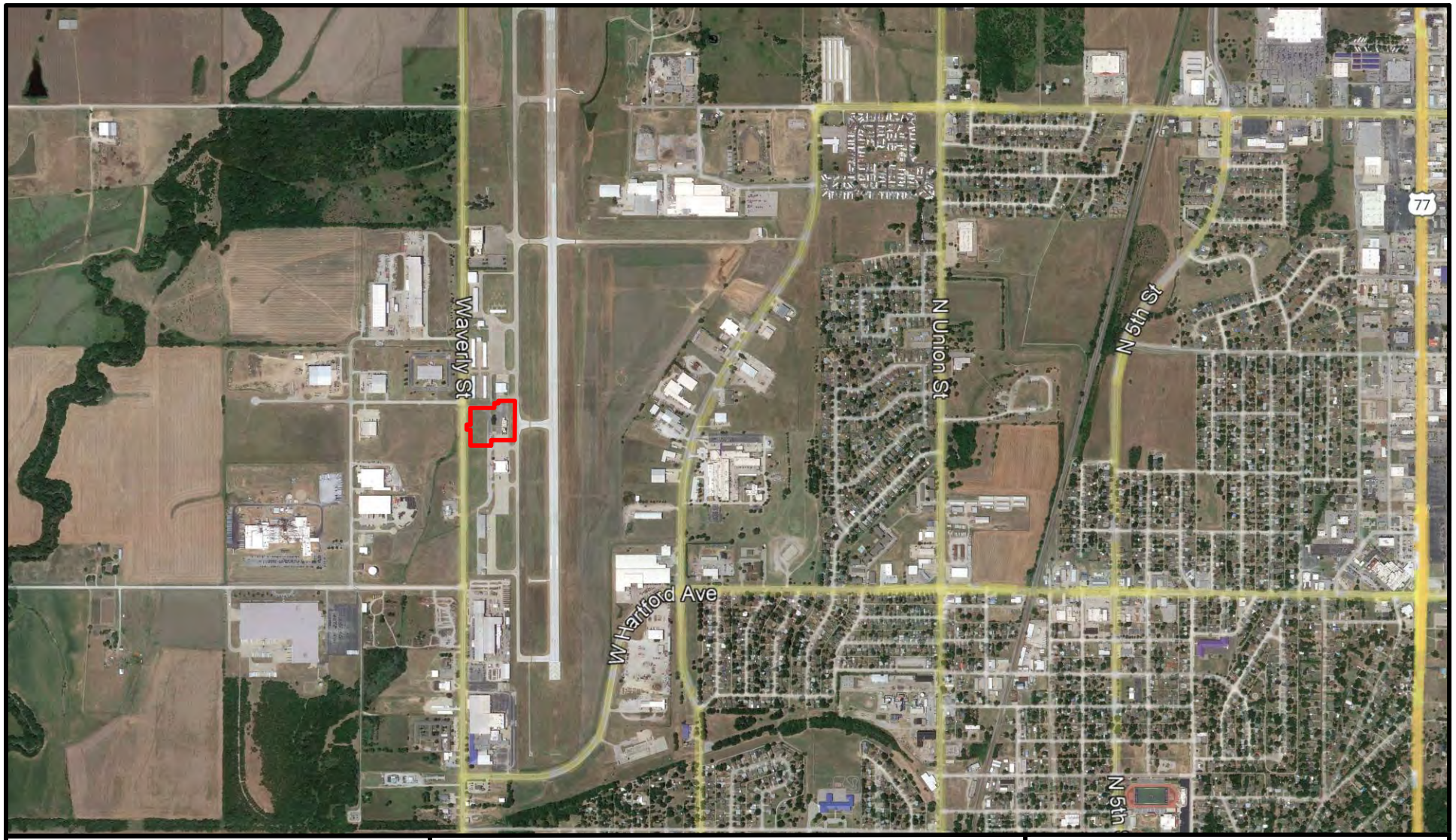
2024 Kay County, Ponca City, Encyclopedia of Oklahoma History and Culture, Oklahoma State Historic Preservation Office. https://www.okhistory.org/publications/enc/entry?entry=KA009. Updated February 9, 2024

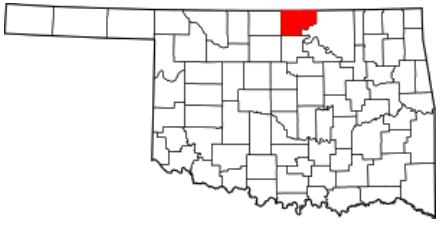
WT Architects

2024 Ponca City Airport Terminal Environmental Study. Prepared for the City of Ponca City. 2025.

ATTACHMENT 1

PROJECT MAP AND VICINITY LOCATION





Kay County, Oklahoma
Part of SW/4 S16 T26N R2E

Area of Potential Effect (APE)

N
W E
S

0.0 0.5

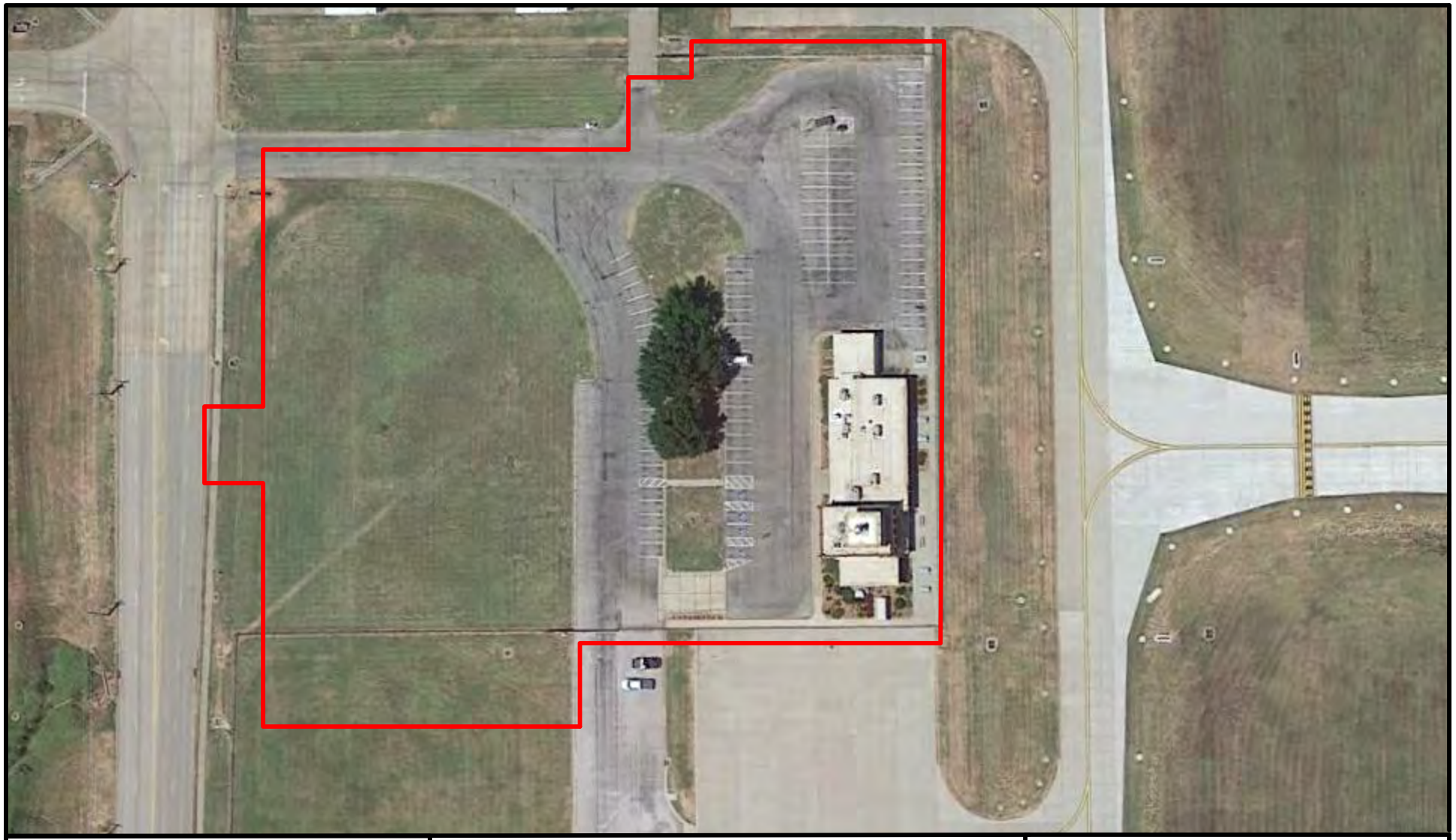
Miles

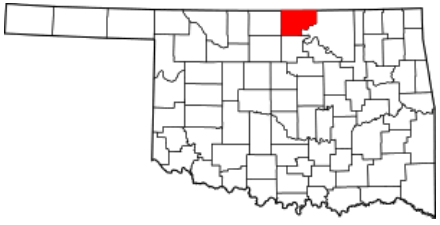
BLACKSHARE ENVIRONMENTAL SOLUTIONS

Area Map

Ponca City Regional Airport
2231 Waverly St.
Ponca City, OK

PROJECT NO.: 4506-22 DATE: 01/24/2023





Kay County, Oklahoma
Part of SW/4 S16 T26N R2E

Area of Potential Effect (APE)

N
W E
S

0.0 150

Feet

BLACKSHARE ENVIRONMENTAL SOLUTIONS

Area of Potential Effect (APE)

Ponca City Regional Airport
2231 Waverly St.
Ponca City, OK

PROJECT NO.: 4506-22 DATE: 01/24/2023

ATTACHMENT 2

PROPOSED ACTION DESIGN

TOTAL PARKING SPACES

EXISTING (EX 98) INCLUDING 4 HC SPACES

PROPOSED (FUT 124) INCLUDING 8 HC SPACES

HC SPACES REQUIRED

76 - 100 TOTAL SPACES : 4 HC
101 - 150 TOTAL SPACES: 5 HC
151 - 200 TOTAL SPACES: 6 HC

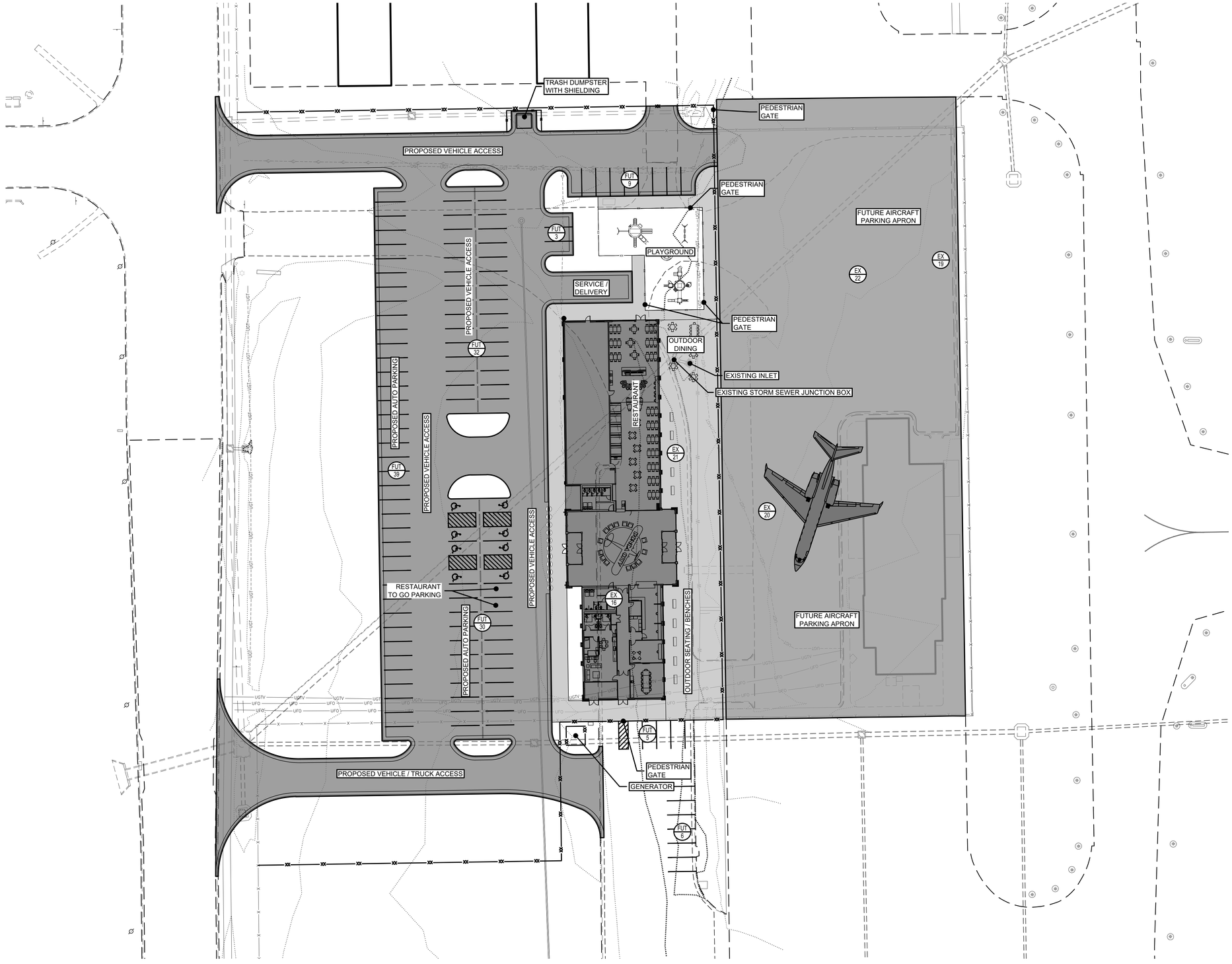
PONCA CITY REGIONAL AIRPORT
NEW TERMINAL PRELIMINARY SITE PLAN

NORTH

0 15' 30' 60' 90'

1" = 30'

Ⓑ PROPOSED BOLLARD



PROPOSED TERMINAL CONSTRUCTION PRELIMINARY SITE PLAN

SHEET 1 OF 1

PROJECT NO

DATE: March 4, 2023

SCALE: 1" = 30'

PONCA CITY REGIONAL AIRPORT
Ponca City, Oklahoma

LBR Inc. Airport Consultants
Ponca City, Oklahoma 74075
1802 West Wright Drive
Tel 405-377-8276 Fax 405-377-3297 WWW.LBROK.COM
CERTIFICATION OF AUTHORIZATION: OKLAHOMA 1827, RENEWAL DATE: JUNE 30, 2025

48 HOURS BEFORE YOU DIG, CALL OKIE
1-800-522-6543
OKLAHOMA ONE-CALL SYSTEM
OKIE 811

NOTE:
CONTRACTOR TO VERIFY LOCATION OF ALL UTILITIES PRIOR TO CONSTRUCTION.

SHEET 1 OF 1

Ponca City Regional Airport – Ponca City, Oklahoma – c:\dropbox\current\ponca city regional airport – prec\2022 new terminal\plan sheets\site plan.dwg Saved: 3/4/2024 10:59 AM Plotted: 3/4/2024 11:03 AM

ATTACHMENT 3

SHPO/OHS, OAS, AND THPO/TRIBAL ORGANIZATION CORRESPONDANCE

U.S. Department of Transportation
Federal Aviation Administration

Arkansas/Oklahoma Airports District Office
Southwest Region

FAA ASW-630
10101 Hillwood Parkway
Fort Worth, Texas 76177

March 29, 2023

Oklahoma Historical Society
State Historic Preservation Office
Attn: Lynda S. Ozan, Deputy State Historic Preservation Officer
800 Nazih Zuhdi Drive
Oklahoma City, OK 73105-7917

Subject: Ponca City Regional Airport (PNC) New Terminal Construction
Kay County, Section 16, Township 26N, Range 2E

Dear Ms. Ozan:

The Federal Aviation Administration (FAA) has received a proposal from Ponca City Regional Airport (PNC) for construction of a new terminal building and removal of the airport's current terminal building. The project would be partially funded with FAA grant funds. The issuance of grant funds is a Federal undertaking subject to compliance with Section 106 of the National Historic Preservation Act (NHPA). We are seeking your review of the project under Section 106 of the NHPA.

The objective of the proposed project is to remove the existing terminal building and design and construct a new terminal building, west of the existing terminal. The terminal was constructed in 1953. The new terminal building is intended to meet existing and future needs at PNC as well has increasing passenger/crew capacity.

To assist in this assessment, we are enclosing a completed Historic Preservation Resource Identification Form along with project exhibits.

Project Location: 2231 Waverly Street in Ponca City, Kay County, OK
Legal Description: Section 16, Township 26 North, Range 2 East

A request for review has also been sent to the Oklahoma Archaeological Survey. If you have any questions or require additional information, please feel free to contact me at: Kelly.M.Oliver-Amy@faa.gov or 817-222-5645.

Sincerely,

Kelly Oliver-Amy
Environmental Protection Specialist
Arkansas/Oklahoma Airports District Office

Attachments

HISTORIC PRESERVATION RESOURCE IDENTIFICATION FORM

PLEASE TYPE ALL DATA IN UPPERCASE - FIELDS IN RED ARE REQUIRED

1. PROPERTY NAME: PONCA CITY AIRPORT TERMINAL (FAA REPLACEMENT PROJECT)

2. RESOURCE NAME: PONCA CITY AIRPORT TERMINAL

3. ADDRESS: 2213 N WAVERLY ST, PONCA CITY, OK 74601

4. CITY: PONCA CITY 5. VICINITY:

6. COUNTY NAME: KAY

7. LOT: 8. BLOCK: 9. PLAT NAME:

10. SECTION: 16 11. TOWNSHIP: 26N 12. RANGE: 2E

13. LATITUDE (NORTH): (ENTER AS: "dd.ddddd") 36.729210

14. LONGITUDE (WEST): (ENTER AS: "-dd.ddddd") -97.101619

15. UTM ZONE: 14 16. NORTHINGS: 4066513 17. EASTINGS: 669516

18. RESOURCE TYPE: BUILDING

19. HISTORIC FUNCTION: AIR-RELATED

20. CURRENT FUNCTION: AIR-RELATED

21. AREA OF SIGNIFICANCE, PRIMARY: COMMERCE

22. AREA OF SIGNIFICANCE, SECONDARY: ARCHITECTURE

23. DESCRIPTION OF SIGNIFICANCE:

THE TERMINAL IS RECOMMENDED NRHP ELIGIBLE UNDER CRITERION A FOR ASSOCIATION WITH ECONOMIC GROWTH OF (SEE CONTINUATION)

24. DOCUMENTATION RESOURCE:

1872 T26N R2E GENERAL LAND OFFICE SURVEY PLAT; 1910 KAY COUNTY PLAT ATLAS; 1915 KAY COUNTY SOIL MAP (SEE CONTINUATION)

25. NAME OF PREPARER: DEAN AFENDRAS AND KATHRYN STCLAIR

59. SURVEY PROJECT NO 26. PROJECT NAME: FAA REPLACEMENT PROJECT

27. DATE OF PREPARATION: 3/15/2023 28. PHOTOGRAPHS YES

29. YEAR: 2023

30. ARCHITECT/BUILDER: (SEE CONTINUATION)

31. YEAR BUILT: 1953

32. ORIGINAL SITE: YES

33. DATE MOVED: N/A

34. FROM WHERE: N/A

35. ACCESSIBLE: YES

36. ARCHITECTURAL STYLE: MODERN MOVEMENT

37. OTHER ARCHITECTURAL STYLE: N/A

38. FOUNDATION MATERIAL: CONCRETE

39. ROOF TYPE: FLAT

40. ROOF MATERIAL: CONCRETE

41. WALL MATERIAL, PRIMARY: BRICK

42. WALL MATERIAL, SECONDARY: METAL

43. WINDOW TYPE: FIXED

44. WINDOW MATERIAL: METAL

45. DOOR TYPE: GLAZED

46. DOOR MATERIAL: METAL

47. EXTERIOR FEATURES: (SEE DESCRIPTION)

48. INTERIOR FEATURES: (SEE DESCRIPTION)

49. DECORATIVE DETAILS: METAL WORDS "PONCA CITY" ON E AND W ELEVATIONS

50. CONDITION OF RESOURCE: EXCELLENT (PERFECTLY MAINTAINED)

51. DESCRIPTION OF RESOURCE:

THE PONCA CITY AIRPORT TERMINAL IS A TWO-STORY BUILDING CONSTRUCTED IN 1953. THE DATE OF CONSTRUCTION IS ON A (SEE CONTINUATION)

52. COMMENTS:

UTM NAD 83

53. ATTACH LOCATION MAP

54. LISTED ON NATIONAL REGISTER: NO

55. NATIONAL REGISTER ENTRY: N/A

56. CONTINUATION

23. DESCRIPTION OF SIGNIFICANCE:
PONCA CITY RELATED TO THE OIL AND GAS INDUSTRY, AND UNDER CRITERION C FOR MODERN MOVEMENT STYLE.

CONTINUATION SHEET, IF APPLICABLE

THE EARLY ECONOMY OF KAY COUNTY WAS DRIVEN BY AGRICULTURE, BUT THE OIL AND GAS INDUSTRY BOOMED IN THE EARLY TWENTIETH CENTURY, PROPELLING THE COUNTY INTO PERIODS OF ECONOMIC GROWTH THROUGHOUT THE CENTURY.

THE IMPORTANT OIL TOWN OF PONCA CITY WAS HEAVILY INFLUENCED BY THE OIL BOOM AND BUST CYCLE IN OSAGE COUNTRY AND THEIR RESPECTIVE COUNTIES. FOR EXAMPLE, PONCA CITY WAS ESTABLISHED IN 1893 AS A CATTLE RANCHING COMMUNITY. HOWEVER, FOLLOWING THE DISCOVERY OF OIL NEAR NEWKIRK IN 1894, THE ECONOMIES OF THE REGION WERE INEXTRICABLY TIED TO THE OIL AND GAS INDUSTRY. THE DISCOVERY OF OIL AT THE BURBANK OIL FIELD IN 1920 FURTHER SOLIDIFIED THE CONNECTION. CENSUS DATA FOR PONCA CITY FOR 1900-1980 BEARS WITNESS TO THIS (PONCA CITY HISTORIC PRESERVATION ADVISORY PANEL N.D.:12; WILSON 2009). TWO PERIODS OF POPULATION SPIKES ARE RECORDED IN THE CENSUS DATA, ONE SPIKE IN THE 1920S AND 1930S (179.7 AND 128.8 PERCENT INCREASES RESPECTIVELY) AND THE OTHER IN THE 1950S AND 1960S (20.2 AND 21.1 PERCENT INCREASES RESPECTIVELY). THE FIRST PERIOD BEGINS WITH THE OIL BOOM WHICH BEGAN IN THE TEENS AND ITS DECLINE COINCIDES WITH THE BUST ASSOCIATED WITH THE ONSET OF THE GREAT DEPRESSION. THE SECOND PERIOD COINCIDES WITH INCREASING ACTIVITY AT THE CONOCO-PHILIPS FACILITY IN PONCA CITY. THE ENERGY INDUSTRY, ALONG WITH RANCHING, CONTINUES TO BE THE ECONOMIC FOUNDATION OF KAY COUNTY.

THE PONCA CITY AIRPORT TERMINAL WAS CONSTRUCTED IN THE POST-WORLD WAR II PERIOD WHEN THE CITY WAS EXPERIENCING A PERIOD OF RAPID GROWTH FUELED BY THE SUCCESS OF THE OIL AND GAS INDUSTRY. IN ADDITION TO A NEW, MODERN TERMINAL, A DRIVE-IN THEATER (AIRLINE DRIVE-IN), NUMEROUS RESIDENTIAL NEIGHBORHOODS, CIVIC (INCLUDING THE MODERN MOVEMENT-STYLE, NRHP-LISTED STONEGATE ELEMENTARY SCHOOL) AND COMMERCIAL BUILDINGS WERE CONSTRUCTED IN THE COMMUNITY DURING THIS PERIOD. THOUGH THE AIRFIELD AND HANGARS WERE ALREADY ESTABLISHED AT THE AIRPORT BEGINNING IN THE 1930S, THE CITY DID NOT HAVE A TERMINAL BUILDING TO HOST THE INFLUX IN PEOPLE MOVING TO THE AREA AND BUSINESS TRAVELERS. THE TERMINAL WAS CONSTRUCTED AS A RESULT OF THE BOOMING LOCAL ECONOMY AND THE TERMINAL DESIGN PROVIDED AN OPPORTUNITY TO EXPRESS THE TECHNOLOGICAL ADVANCEMENTS AND OPTIMISM OF THE CITY WITH THE MODERN STYLE. THEREFORE, THE TERMINAL BUILDING RETAINS HISTORICAL SIGNIFICANCE UNDER CRITERIA A FOR THE ASSOCIATION WITH THE ECONOMIC AND POPULATION DEVELOPMENT OF PONCA CITY AS A DIRECT RESULT OF THE OIL AND GAS INDUSTRY AND POST-WORLD WAR II GROWTH.

THE PONCA CITY AIRPORT TERMINAL WAS DESIGNED BY WILLIAM R. BROWN, AN ARCHITECT WHO ALSO DESIGNED THE NRHP LISTED PONCA CITY POWER PLANT AND ASSISTED WITH THE DESIGN OF THE NRHP-LISTED FIRST PRESBYTERIAN CHURCH (ALSO DESIGNED IN THE MODERN MOVEMENT STYLE). (SEE CONTINUATION)

23. DESCRIPTION OF SIGNIFICANCE:
WITH FURTHER RESEARCH, THE TERMINAL MAY BE CONSIDERED HISTORICALLY SIGNIFICANT UNDER CRITERION B FOR ASSOCIATION WITH WILLIAM R. BROWN, ON THE LOCAL LEVEL, AS THIS ARCHITECT CURRENTLY HAS TWO NRHP-LISTED BUILDINGS ASSOCIATED WITH HIM AND HIS ARCHITECTURAL DESIGN.

THE PONCA CITY AIRPORT TERMINAL EXHIBITS CHARACTERISTICS OF THE MODERN MOVEMENT STYLE, WHICH IS A BROAD TERM THAT ENCOMPASSES ART DECO, ART MODERNE, STREAMLINE MODERNE AND THE INTERNATIONAL STYLES SPANNING FROM THE 1920S THROUGH THE 1950S. THE TERMINAL, WITH THE CUBIC GEOMETRY, FLAT ROOF, HORIZONTAL BANDING OF BRICK AND WINDOWS, CLEAN LINES AND ART DECO STYLE SIGNAGE DISPLAYS FEATURES OF ART DECO AND INTERNATIONAL STYLES WITHIN THE MODERN MOVEMENT. THOUGH THERE HAVE BEEN SOME ADDITIONS, THE ORIGINAL RECTANGULAR MASSING, LACK OF ORNAMENTATION AND MATERIALS REMAINS INTACT. THE TERMINAL DESIGN RETAINS A SENSE OF FUNCTION AND A STREAMLINED FORM OVER ORNAMENTATION, WHILE THE MODERN DESIGN AND MATERIALS, FORM AND SCALE OF THE BUILDING CONVEYS PONCA CITY'S EXPRESSION OF TECHNOLOGICAL ADVANCEMENT, ECONOMIC GROWTH, AND PARTICIPATION IN THE COUNTRY'S POST WAR INDUSTRIAL ADVANCEMENTS.

THE TERMINAL BUILDING IS LOCATED WITHIN PONCA CITY MUNICIPAL AIRPORT COMPLEX, WHICH WAS ESTABLISHED IN 1930 WITH THE NRHP-LISTED AIRPORT BRICK HANGAR (OLI #101059) AND LATER THE NRHP-LISTED WEST HANGAR (OLI #102090) CONSTRUCTED IN 1942. THE AIRPORT SETTING, INCLUDING THE HANGARS AND AIRFIELD IS INTACT, CONVEYING THE FEELING AND ASSOCIATION OF A MODERN MOVEMENT STYLE ERA AIRPORT COMPLEX. OVERALL, THE TERMINAL RETAINS INTEGRITY OF DESIGN, WORKMANSHIP, MATERIALS, LOCATION, FEELING, SETTING AND ASSOCIATION OF A BUILDING CONSTRUCTED IN RESPONSE TO RAPID GROWTH OF PONCA CITY AS A RESULT OF THE SUCCESSFUL OIL AND GAS INDUSTRY AND IS THEREFORE RECOMMENDED AS ELIGIBLE FOR LISTING IN THE NRHP UNDER CRITERION A AND C WITH THE PERIOD OF SIGNIFICANCE AS 1953 THROUGH THE MID-1970S. THE TERMINAL BUILDINGS AND ASSOCIATED HANGARS MAY BE CONSIDERED A HISTORIC DISTRICT OR COMPLEX WITH MULTIPLE PERIODS OF SIGNIFICANCE AND AREAS OF SIGNIFICANCE.

24. DOCUMENTATION RESOURCE:
1925, 1931, 1931 (REV. 1947) SANBORN FIRE INSURANCE MAPS

1936, 1936 (REV. 1937), 1953 (REV. 1957), 1953 (REV. 1958), 1963 (REV. 1968), 1969 (1972), 1976 (REV. 1977), 1976 (REV. 1983), 1986 (REV. 1988), 1986 (REV. 1988) KAY COUNTY HIGHWAY MAPS

1938, 1954, 1961, 1966, 1973, 1980, 1981, 1990, 2003, 2005, 2006, 2008, 2010, 2013, 2015, 2017, 2019, 2021 USDA AERIAL PHOTOGRPAHS

1968 (PHOTOREVISED 1979) PONCA CITY, OKLA. 7.5' USGS QUADRANGLE

2012, 2014, 2022 GOOGLE EARTH AERIAL PHOTOGRAPHS

DENSON, PAULA CARMACK
2009 PONCA CITY. IN, *THE ENCYCLOPEDIA OF OKLAHOMA HISTORY AND CULTURE*. OKLAHOMA STATE HISTORIC PRESERVATION OFFICE. ELECTRONIC DOCUMENT, HTTPS://WWW.OKHISTORY.ORG/PUBLICATIONS/ENC/ENTRY?ENTRY=PO008, ACCESSED MARCH 14, 2023.

PONCA CITY HISTORIC PRESERVATION ADVISORY PANEL
ND HISTORIC CONTEXT FOR PONCA CITY, MANAGEMENT REGION 2. SUBMITTED TO THE OKLAHOMA STATE HISTORIC PRESERVATION OFFICE, OKLAHOMA CITY. ELECTRONIC DOCUMENT, HTTP://WWW.OKHISTORY.ORG/SHOP/CONTEXTS/REGION2PONCACITY.PDF, ACCESSED JUNE 24, 2014.

WILSON, LINDA D.
2009 KAY COUNTY. IN, *THE ENCYCLOPEDIA OF OKLAHOMA HISTORY AND CULTURE*. OKLAHOMA STATE HISTORIC PRESERVATION OFFICE. ELECTRONIC DOCUMENT, HTTPS://WWW.OKHISTORY.ORG/PUBLICATIONS/ENC/ENTRY.PHP?ENTRY=KA009, ACCESSED JUNE 29, 2022.

30. ARCHITECT/BUILDER:
WILLIAM R. BROWN A.I.A. ARCHITECT/THE CITY OF PONCA CITY, CIVIL AERONAUTICS ADMINISTRATION, ROBERTSON CONSTRUCTION CO.

51. DESCRIPTION OF RESOURCE:
PLAQUE INSIDE THE TERMINAL. THE PLAQUE ALSO SAYS THE TERMINAL WAS DESIGNED BY WILLIAM R. BROWN A.I.A. ARCHITECT AND CONSTRUCTED BY THE CITY OF PONCA CITY, THE CIVIL AERONAUTICS ADMINISTRATION, AND ROBERTSON CONSTRUCTION CO. IN ADDITION TO BEING AN AIRPORT TERMINAL, THE BUILDING ALSO CONTAINS ENRIQUE'S MEXICAN RESTAURANT, AND THE TRAFFIC CONTROL TOWER IS ON TOP OF THE TWO-STORY PORTION OF THE TERMINAL. AN ADDITION WAS BUILT ON THE NORTH SIDE OF THE TERMINAL BETWEEN 1995 AND 2003.

THE ORIGINAL PORTION OF THE TERMINAL HAS BRICK-CLAD WALLS. ALL WINDOWS ARE METAL AND FIXED. THE SOUTHERN ELEVATION OF THE LOWER AND UPPER STORY HAS CORNER WINDOWS WITH METAL SUPPORTS. ALL BUT TWO OF THE SECURITY DOORS ON THE TWO-STORY PORTION OF THE NORTH ELEVATION ARE METAL WITH FULL GLASS. THE TWO SECURITY DOORS ON THE NORTH ELEVATION ARE METAL WITH THREE WINDOWS. THIS AREA HAS A FLAT METAL COVERING ABOVE THE DOORS. THE NORTHEAST ELEVATION IS A DINING AREA FOR ENRIQUE'S, ENCLOSED ENTIRELY BY FLOOR-TO-CEILING GLASS WINDOWS AND DOORS. THE ROOF OF THE ONE-STORY PORTION IS FLAT AND OF CONCRETE, OVERHANGING THE WALLS BY A FEW FEET. THE TWO-STORY PORTION WITH THE CONTROL TOWER IS ALSO FLAT BUT HAS A LOW WALL AND METAL RAILING AROUND THE EDGE. THE LEVEL WITH THE CONTROL TOWER IS ACCESSIBLE FORM THE ONE-STORY ROOF BY AN EXTERIOR METAL LADDER. THE CONTROL TOWER CONSISTS OF VERTICAL WALLS ABOVE WHICH ARE EVERTED METAL FIXED WINDOWS IN ALL CARDINAL DIRECTIONS. THE LOWER WALL WAS COVERED WITH PROTECTIVE SHEETING. THE WEST SIDE OF THE CONTROL TOWER HAD A SINGLE METAL DOOR WITH A SMALL WINDOW. THE ONLY DECORATIVE ELEMENTS ON THE TERMINAL ARE THE METAL WORDS "PONCA CITY" ON THE TWO-STORY PORTION OF THE EAST AND WEST ELEVATIONS, ABOVE THE WINDOWS. THE ILLUMINATED METAL SIGN FOR "ENRIQUE'S MEXICAN RESTAURANT" IS ON THE WEST ELEVATION TO THE LEFT OF THE TERMINAL ENTRANCE. OVERALL, THE EXTERIOR OF THE TERMINAL IS IN GOOD CONDITION AND WELL MAINTAINED.

THE ADDITION ON THE NORTH SIDE OF THE TERMINAL HAS A CONCRETE FOUNDATION WITH METAL WALLS AND A FLAT METAL ROOF. A SINGLE METAL SLAB DOOR IS ON THE EAST ELEVATION AND A SINGLE METAL SLIDING WINDOW IS ON THE NORTH ELEVATION.

ONLY THE PUBLIC AREAS OF THE INTERIOR WERE ACCESSIBLE. THE TERMINAL INTERIOR HAS A MIX OF PAINTED, TILED, AND BRICK-CLAD WALLS WITHIN THE COVERED PORTION OF THE RESTAURANT. THERE IS A DROPPED CEILING. OVERALL, THE EXTERIOR OF THE TERMINAL IS IN GOOD CONDITION AND WELL MAINTAINED.

THE EARLIEST MAP SHOWING AN AIRPORT AT THIS LOCATION IS THE 1931 SANBORN FIRE INSURANCE MAP. THE PREVIOUS SANBORN MAP FOR 1925 DOES NOT SHOW AN AIRPORT. THE ONLY BUILDING SHOWN IN 1931 AT THE AIRPORT IS THE PONCA CITY AIRPORT BRICK HANGAR (OLI #101059)/PONCA CITY MUNICIPAL AIRPORT HANGAR (NR #RS100004173). THE BRICK HANGAR IS ALSO THE ONLY AIRPORT BUILDING VISIBLE ON THE 1938 AERIAL PHOTOGRAPH AND IS STILL STANDING 315 FEET SOUTH OF THE TERMINAL. IN ADDITION TO THE BRICK HANGAR, THE 1947 REVISION OF THE 1931 SANBORN FIRE INSURANCE MAP SHOWS THE SCHOOL OF AERONAUTICS (NOT SHOWN ON ANY MAP OR AERIAL PHOTOGRAPH) APPROXIMATELY 180 FEET TO THE NORTH OF THE HANGAR. ALTHOUGH NOT SHOWN ON THE 1947 SANBORN MAP, BUILDINGS ASSOCIATED WITH THE DARR SCHOOL OF AERONAUTICS (1941 – 1944) ARE VISIBLE ON THE 1954 AERIAL PHOTOGRAPH 2,640 FEET NORTHEAST OF THE TERMINA (DENSON 2009). THE TERMINAL WAS BUILT IN 1953 AND IS CLEARLY VISIBLE ON THE 1954 AERIAL PHOTOGRAPH. PART OF THE CURRENT PARKING LOT IS VISIBLE TO THE WEST AND NORTH AND THE TAXIWAY WAS NEARER TO THE EASTERN SIDE OF THE TERMINAL THAN IT IS NOW. THERE IS A MIX OF GRASSY AND PAVED AREAS TO THE SOUTH BETWEEN THE TERMINAL AND BRICK HANGAR. TWO RUNWAYS ARE VISIBLE IN 1954, ONE MEASURING 4,790 FEET NORTH-SOUTH WHICH IS INTERSECTED BY A SOUTHWEST-NORTHEAST ONE MEASURING 3,490 FEET. THE HANGAR 280 FEET NORTH OF THE TERMINAL WAS BUILT BY 1954 AND THE FIRST OF THE LONG (NORTH-SOUTH) BUILDINGS 275 FEET NORTHWEST OF THE TERMINAL WERE BUILT BY 1961. BETWEEN 1954 AND 1973, ADDITIONAL BUILDINGS WERE CONSTRUCTED BETWEEN THE NORTH-

SOUTH RUNWAY AND WAVERLY ST (THE NEAREST 580 FEET NORTHWEST OF THE TERMINAL). THE 1966 AERIAL PHOTOGRAPH SHOWS THE SOUTHWEST-NORTHEAST ORIENTED RUNWAY HAD RECENTLY BEEN REMOVED WHILE THE REMAINING NORTH-SOUTH RUNWAY WAS EXTENDED 1,800 FEET FURTHER NORTH. SINCE 1973, ADDITIONAL BUILDINGS HAVE BEEN CONSTRUCTED BETWEEN THE NORTH-SOUTH RUNWAY AND WAVERLY ST WHILE MOST OF THE BUILDINGS ASSOCIATED WITH THE DARR SCHOOL OF AERONAUTICS WERE REMOVED OR MODIFIED. THERE WERE ALSO RECONFIGURATIONS TO THE TAXIWAYS AND ADDITIONAL INFRASTRUCTURE ADDED. THE RUNWAY WAS EXTENDED ANOTHER 980 FEET BY 2003. BETWEEN 2008 AND 2010, THE TAXIWAY ON THE EAST SIDE OF THE TERMINAL WAS REMOVED AND A GRASSY AREA ESTABLISHED BETWEEN THE TERMINAL AND TAXIWAY. BY 2010, THE AIRPORT, AS IT IS PRESENTLY, WAS SET.

FIVE PROPERTIES ASSOCIATED WITH THE PONCA CITY AIRPORT ARE LISTED IN THE OLI, TWO OF WHICH ARE CROSS LISTED IN THE NRHP (TABLE 1).

Table 1. OLI and NRHP properties associated with the Ponca City Airport.

OLI Property	NRHP Property	Description
Ponca City Airport Brick Hangar (OLI #101059)	Ponca City Municipal Airport Hangar (NR #RS100004173)	Art Deco hangar built 1930 – 1932. Significant under Criterion A for economics is it "symbolized the strong economic relationship between a burgeoning aviation sector and Oklahoma's oil industry" (2018 NRHP Form). Also significant for military as a part of the WWII British and American pilot training program with the Darr School of Aeronautics 1941 – 1944.
Ponca City Airport Building Foundation (OLI #102087)	N/A	Slab foundation of former WWII building constructed in 1942. Not eligible due to razing.
Ponca City Airport Building Center Hangar (OLI #102088)	N/A	Round-roofed rectangular airplane hangar constructed in 1942. Not eligible due to alterations.
Ponca City Airport Building East Hangar (OLI #102089)	N/A	Round-roofed rectangular airplane hangar constructed in 1942. Not eligible due to alterations.
Ponca City Airport Building West Hangar (OLI #102090)	Darr School of Aeronautics Hangar No. 3 (NR #06000794)	Steel, closed arch truss hangar built in 1942, significant under Criterion A for military and economics, and under Criterion C for architecture for the period of 1942 – 1944. The hangar was originally built for the WWII British and American pilot training program with the Darr School of Aeronautics (1941 – 1944) and was subsequently part of the Ponca City Airport during post-WWII economic growth of the city. It is also an example of WWII-era-era prefabricated airplane hangars.

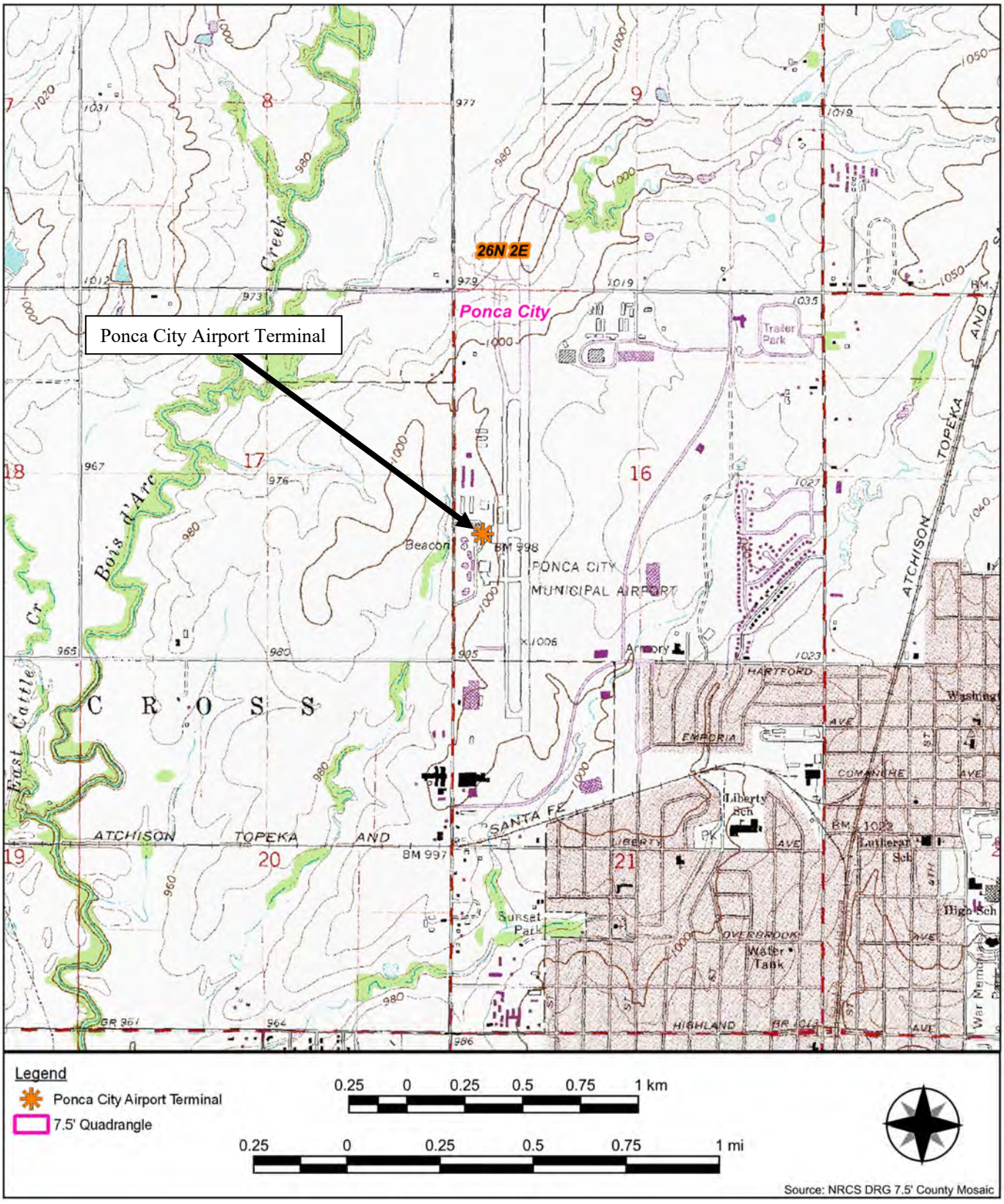


Figure 1. Property on topographic map.

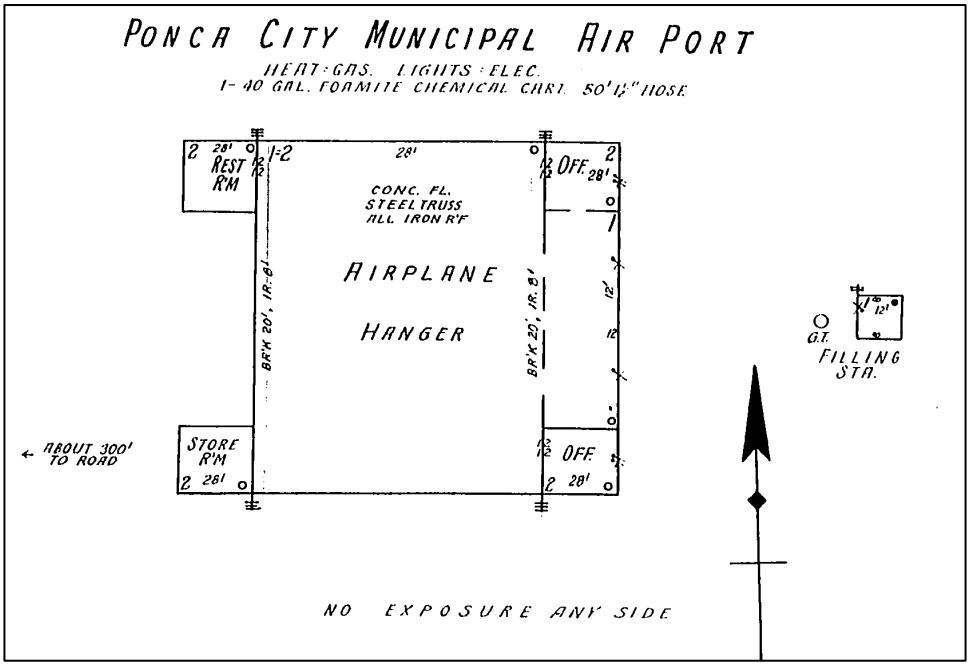


Figure 2. Inset from 1931 Sanborn Fire Insurance Map, showing Ponca City Airport Brick Hangar (OLI #101059)/Ponca City Municipal Airport Hangar (NR #RS100004173).

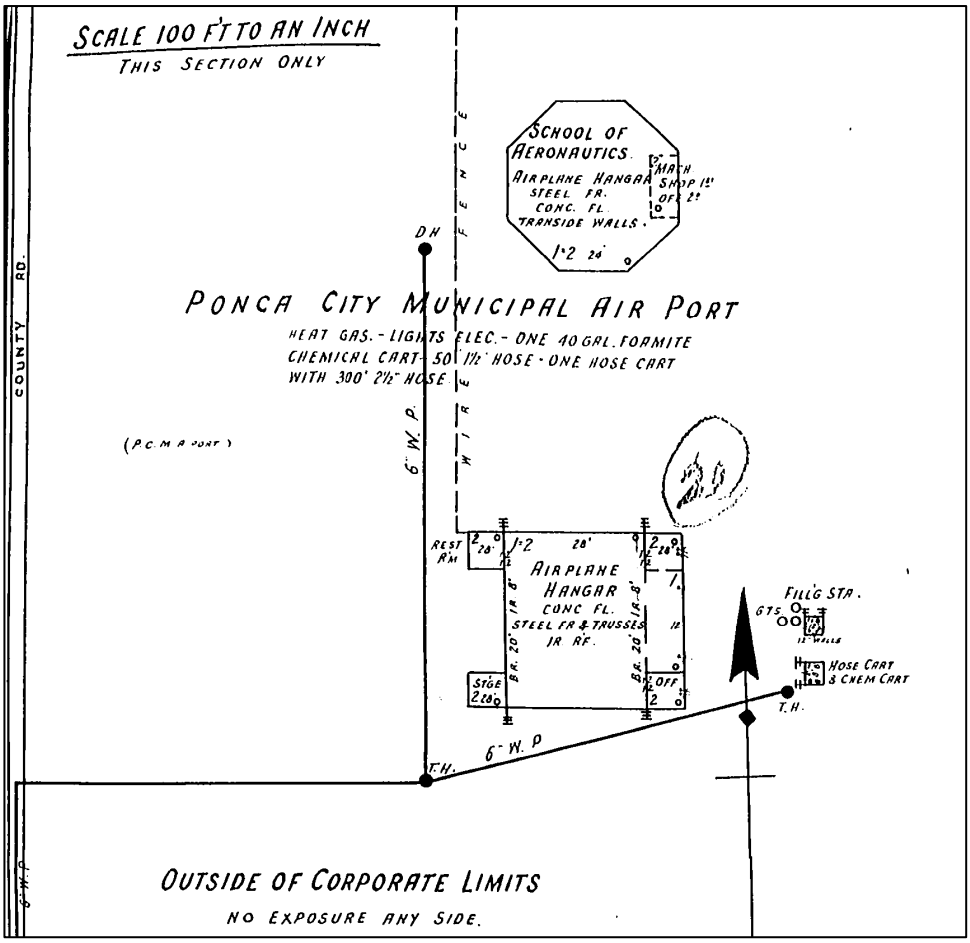


Figure 3. Inset from 1931 Sanborn Fire Insurance Map, showing Ponca City Airport Brick Hangar (OLI #101059)/Ponca City Municipal Airport Hangar (NR #RS100004173) and School of Aeronautics (not extant).

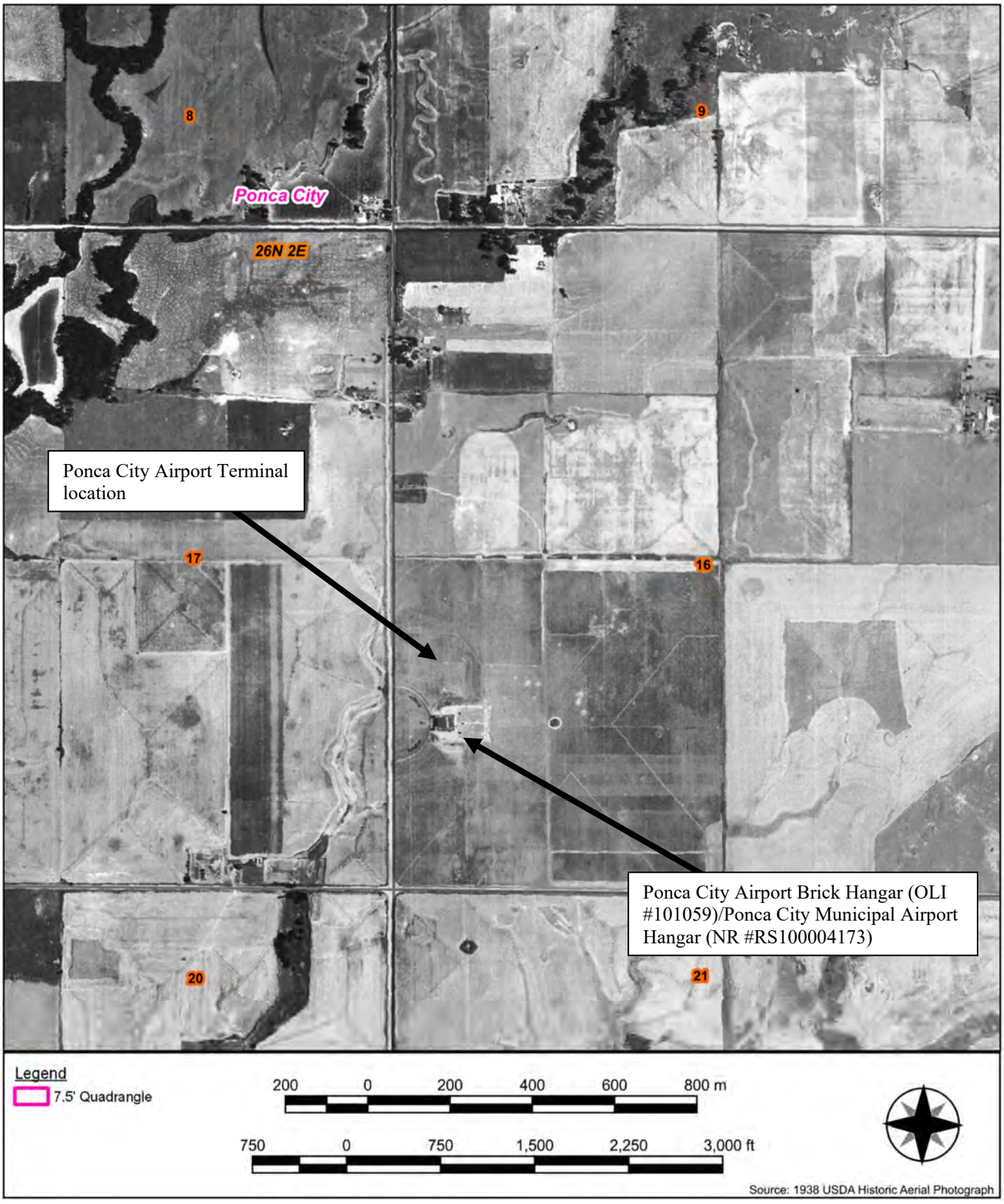


Figure 4. Property location on 1938 aerial photograph.

Figure 5. Property on 1954 aerial photograph.

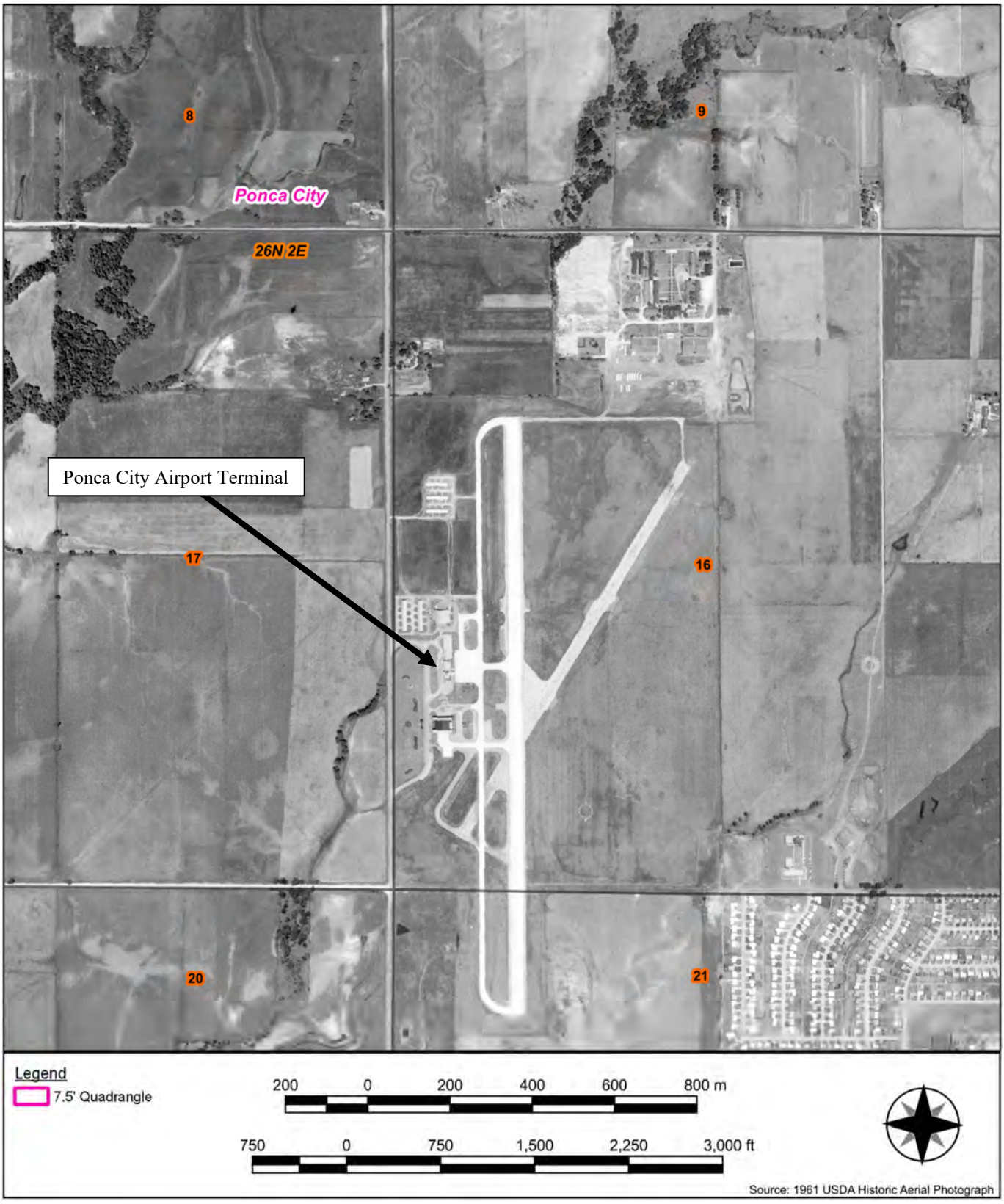


Figure 6. Property on 1961 aerial photograph.

Figure 7. Property on 1973 aerial photograph.

Figure 8. Property on 1980 aerial photograph.

Figure 9. Property on 1995 aerial photograph.

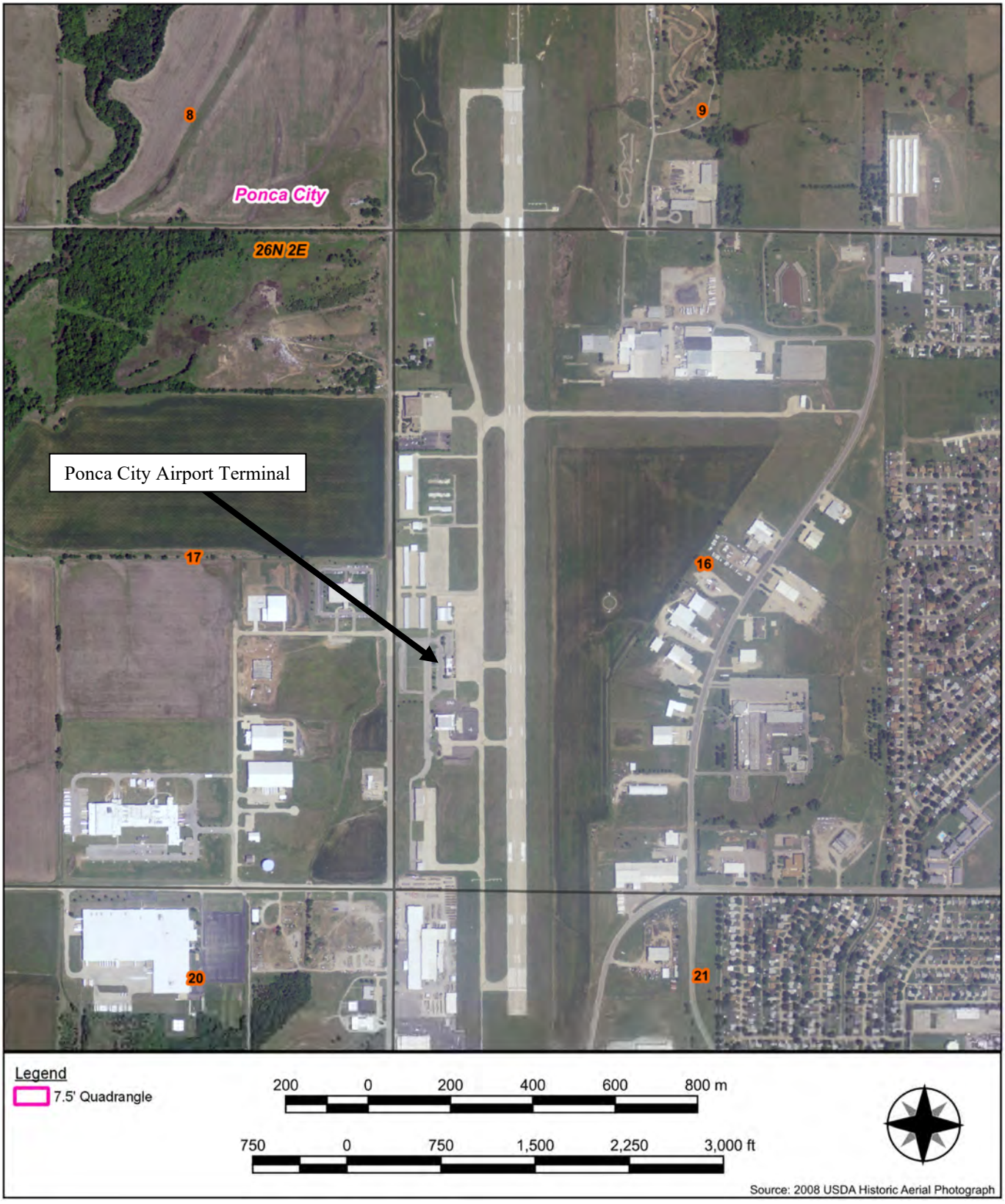


Figure 10. Property on 2008 aerial photograph.

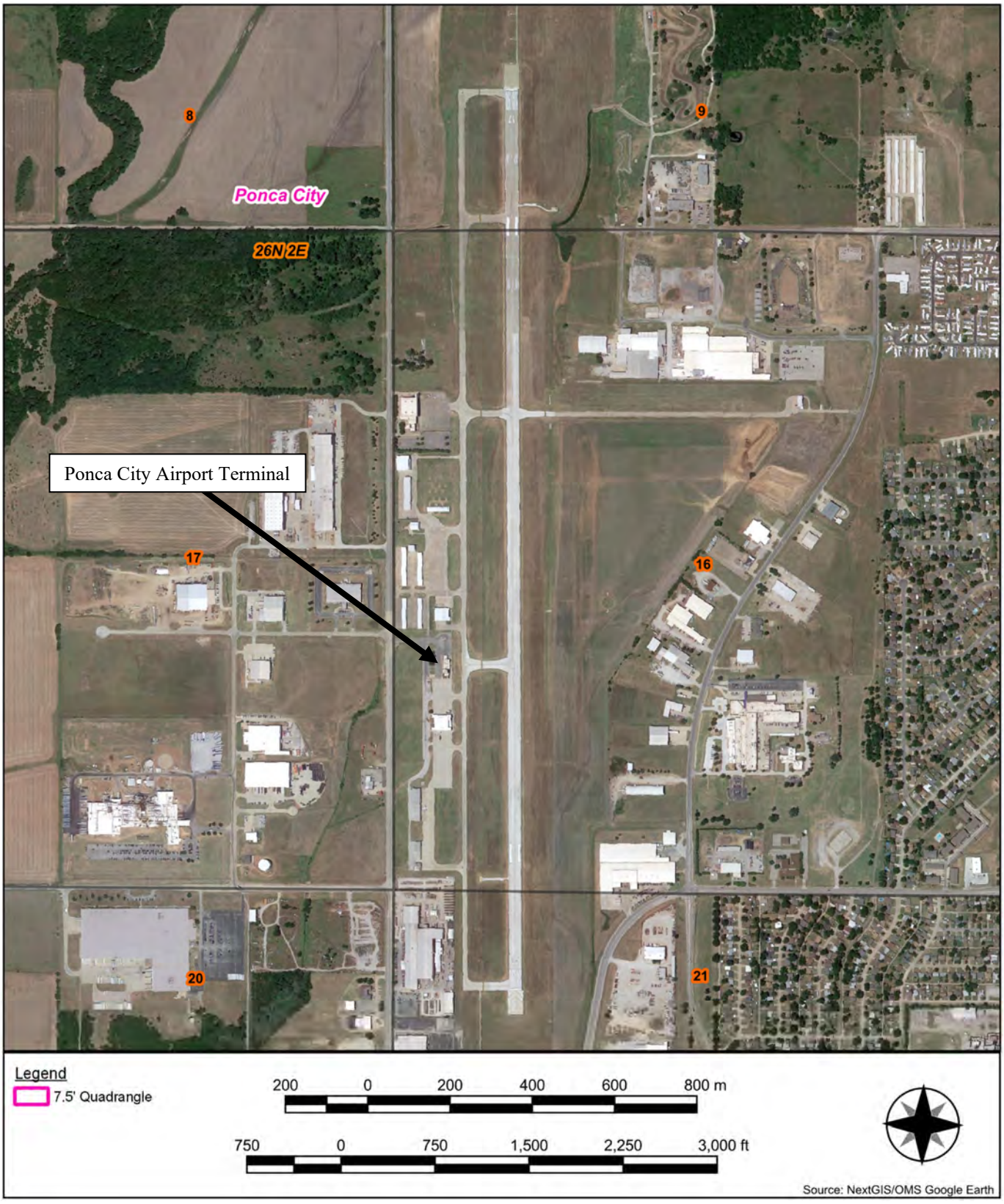


Figure 11. Property on 2022 aerial photograph.

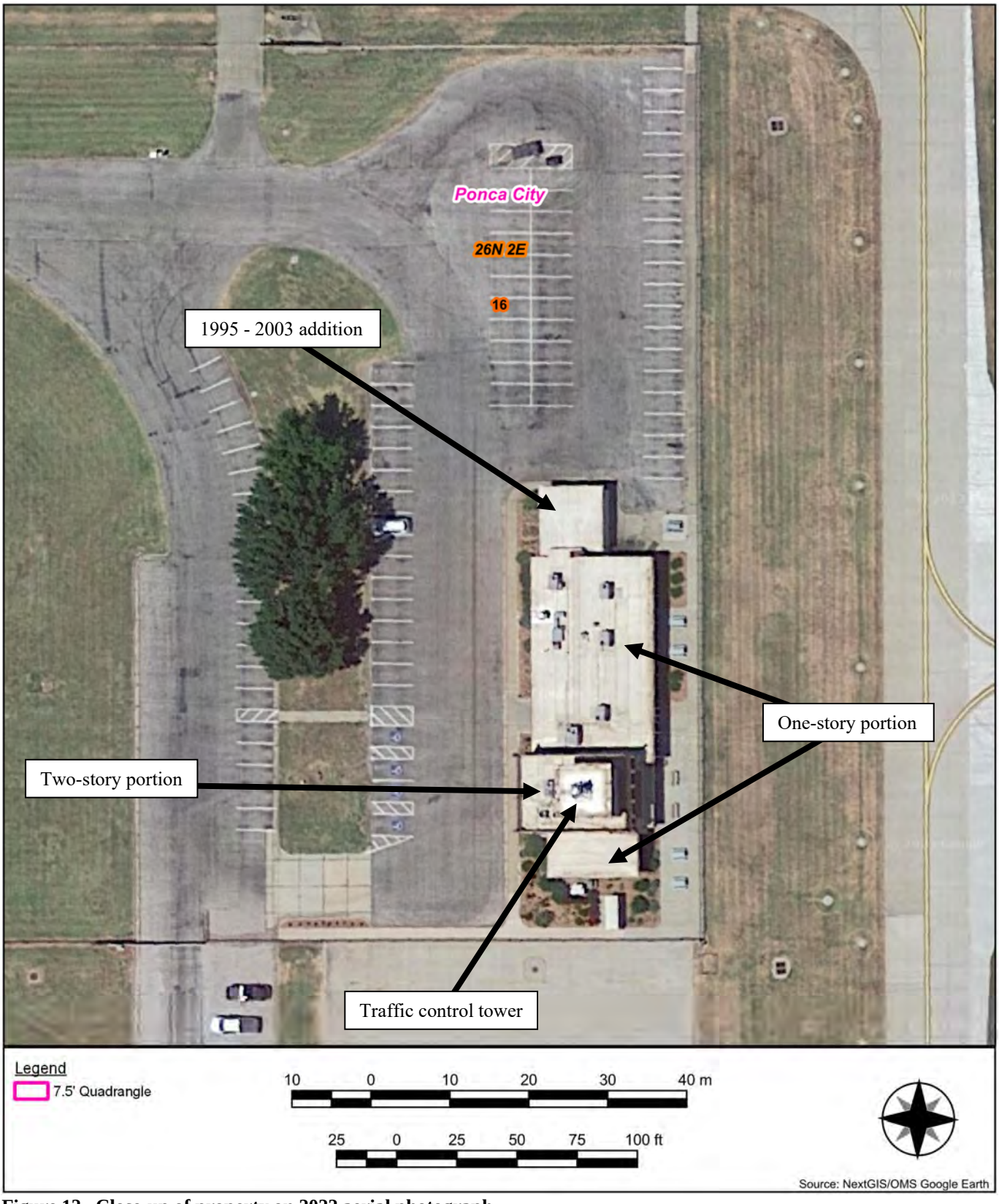
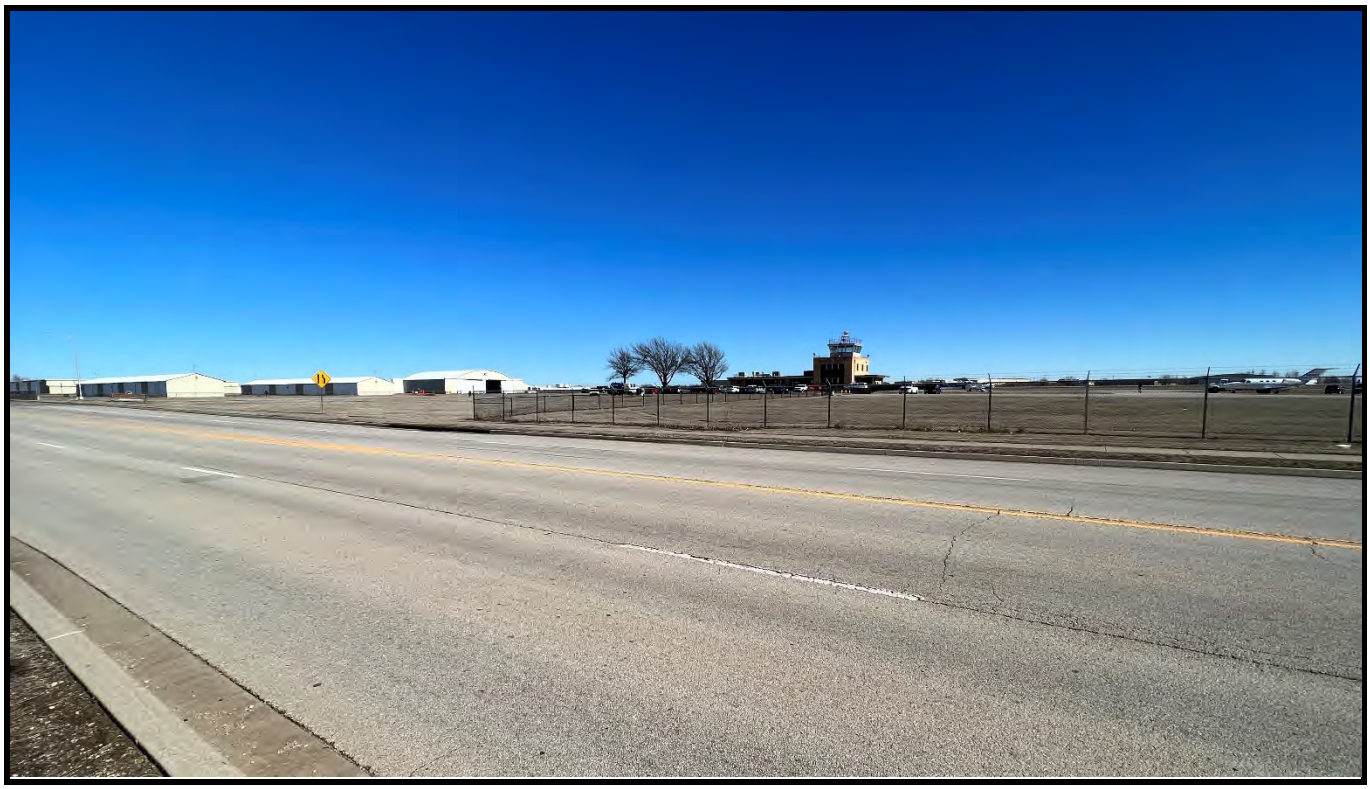


Figure 12. Close-up of property on 2022 aerial photograph.

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal from Waverly St, facing southeast
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 1 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal from Waverly St, facing east
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 2 of 33



Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal from Waverly St, facing northeast
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 3 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal and parking lot, facing southeast
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 4 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal and parking lot, facing southwest
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 5 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal, facing south
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 6 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal, facing southeast

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 7 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal and parking lot, facing east

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 8 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal and parking lot, facing northeast
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 9 of 33

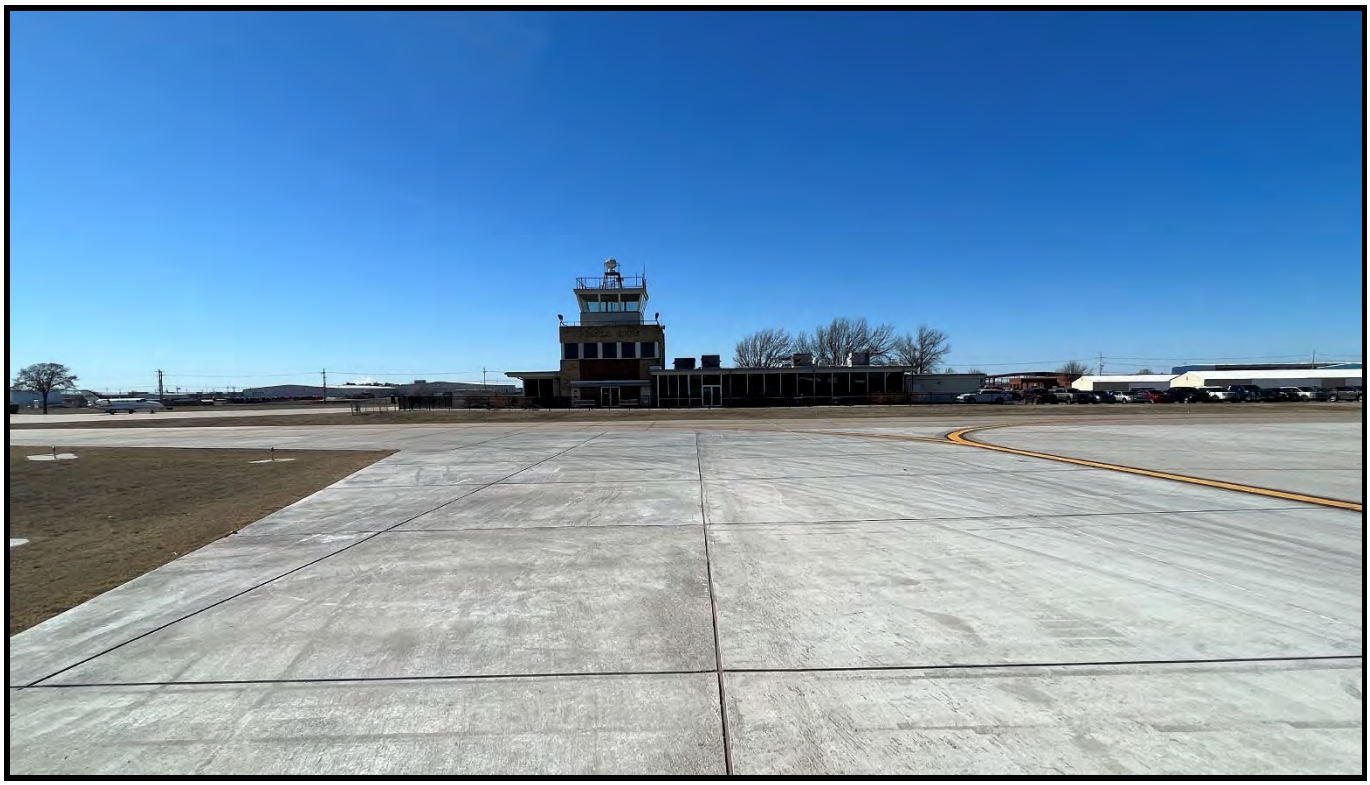
Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal, facing northeast
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 10 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal, facing north

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 11 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal, facing northwest

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 12 of 33



Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal from taxiway, facing west
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 13 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal, facing southwest
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 14 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal addition, facing southwest

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 15 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal addition, facing southwest

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 16 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal addition, facing south

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 17 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal addition, facing southeast

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 18 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal addition, facing east

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 19 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal, facing southeast

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 20 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal, facing northeast
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 21 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal, facing east
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 22 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal, facing northwest

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 23 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal, facing northwest

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 24 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal, facing west

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 25 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal, facing southwest

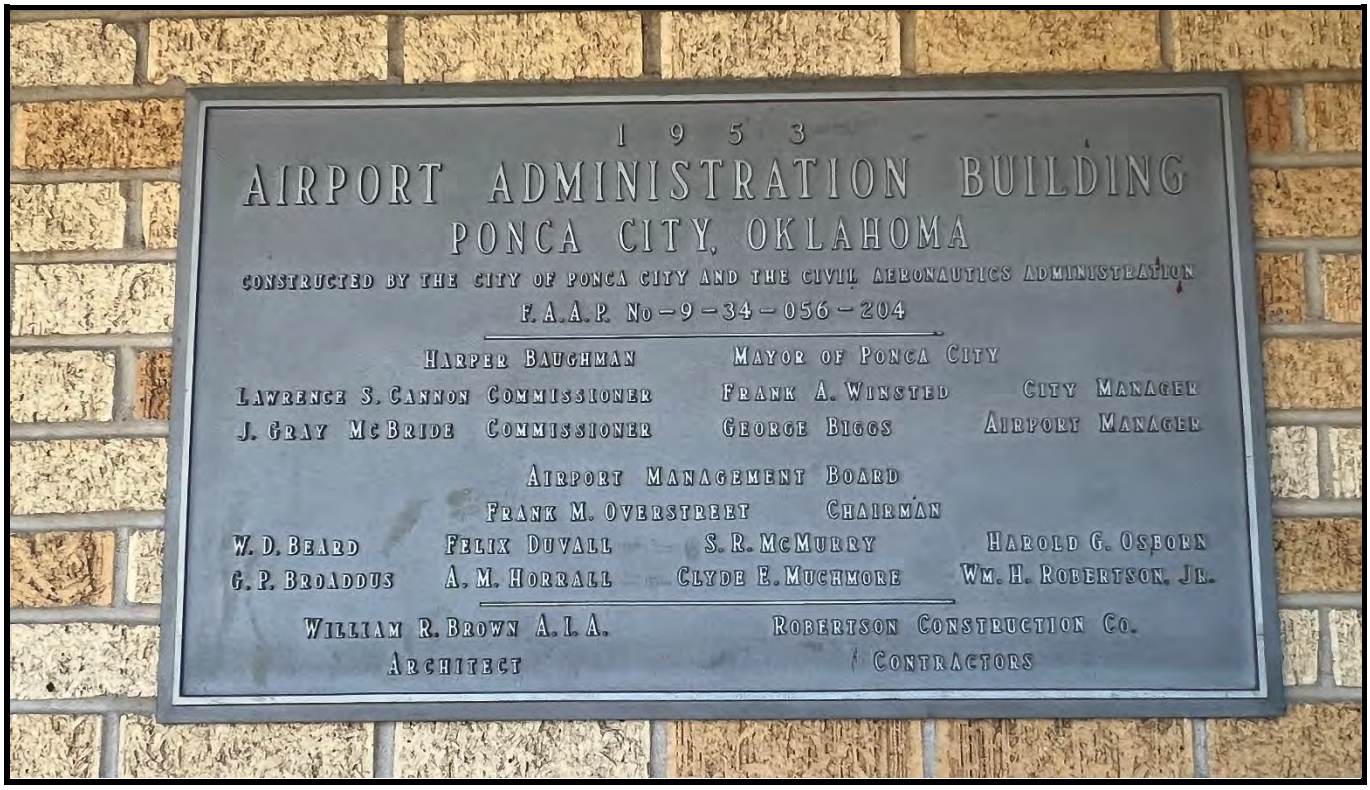
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 26 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal roof, facing south to control tower
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 27 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Control tower, facing south
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 28 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Control tower, facing northeast

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 29 of 33

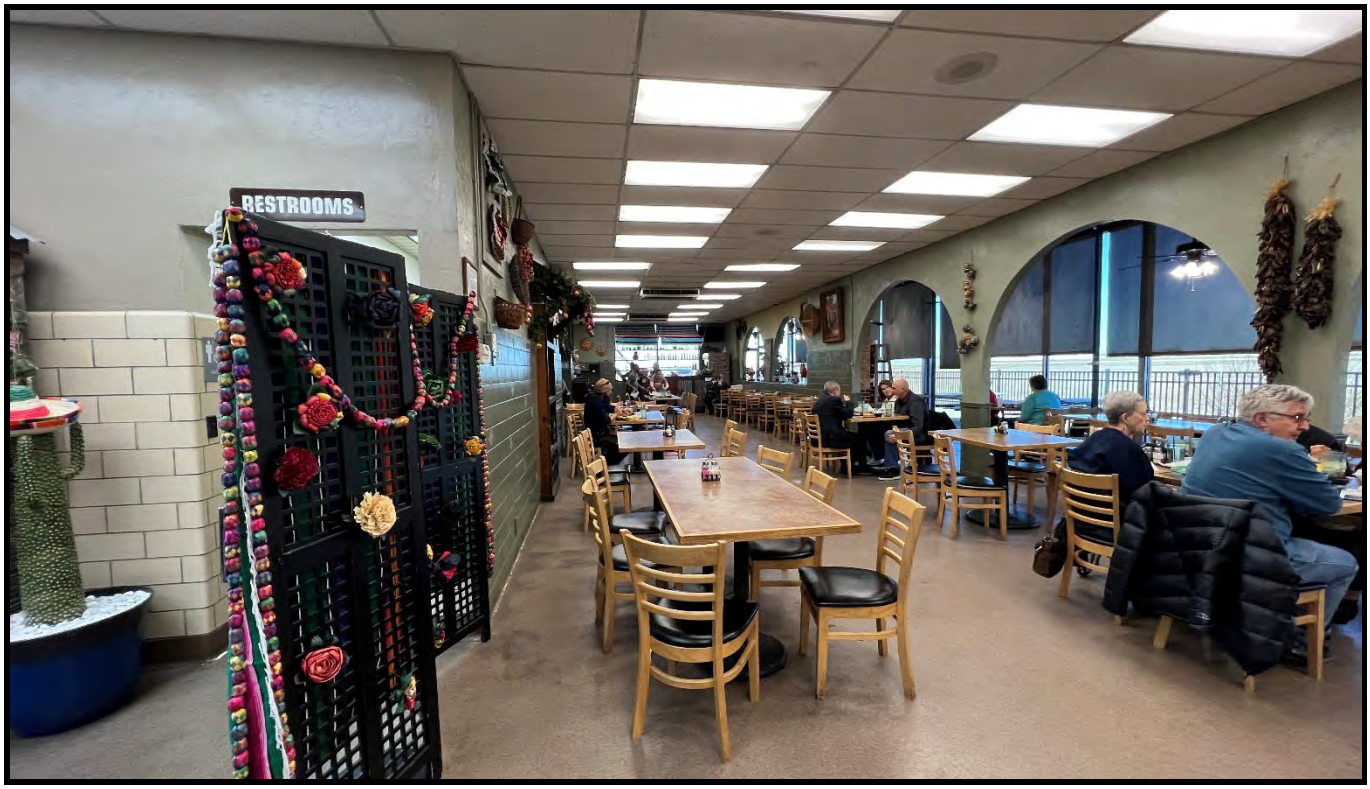


Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal plaque

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 30 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal interior

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 31 of 33



Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal interior, Enrique's Restaurant

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 32 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Enrique's Restaurant sign

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 33 of 33

U.S. Department of Transportation
Federal Aviation Administration

Arkansas/Oklahoma Airports District Office
Southwest Region

FAA ASW-630
10101 Hillwood Parkway
Fort Worth, Texas 76177

March 29, 2023

Oklahoma Archeological Survey
University of Oklahoma
Attn: Dr. Kary Stackelbeck, State Archaeologist
111 Chesapeake Street
Norman, OK 73019-5111

Subject: Ponca City Regional Airport (PNC) New Terminal Construction
Kay County, Section 16, Township 26N, Range 2E

Dear Dr. Stackelbeck:

The Federal Aviation Administration (FAA) has received a proposal from Ponca City Regional Airport (PNC) for construction of a new terminal building and removal of the airport's current terminal building. The project would be partially funded with FAA grant funds. The issuance of grant funds is a Federal undertaking subject to compliance with Section 106 of the National Historic Preservation Act (NHPA). We are seeking your review of the project under Section 106 of the NHPA.

The objective of the proposed project is to remove the existing terminal building and design and construct a new terminal building, west of the existing terminal. The terminal was constructed in 1953. The new terminal building is intended to meet existing and future needs at PNC as well has increasing passenger/crew capacity.

To assist in this assessment, we are enclosing a completed maps and project exhibits.

Project Location: 2231 Waverly Street in Ponca City, Kay County, OK
Legal Description: Section 16, Township 26 North, Range 2 East

A request for review has also been sent to the Oklahoma State Historical Preservation Office. If you have any questions or require additional information, please feel free to contact me at: Kelly.M.Oliver-Amy@faa.gov or 817-222-5645.

Sincerely,

Kelly Oliver-Amy
Environmental Protection Specialist
Arkansas/Oklahoma Airports District Office

Attachments

Oklahoma Historical Society
State Historic Preservation Office

April 25, 2023

Ms. Kelly Oliver-Amy
Arkansas-Oklahoma Airports Dist. Office
FAA-ASW-630
10101 Hillwood Parkway
Fort Worth, TX 76177

RE: File #1277-23; FAA Proposed New Terminal Project at Ponca City Regional Airport, 2213 Waverly Street, Ponca City, Kay County, Oklahoma

Dear Ms. Oliver-Amy:

We have received and reviewed the documentation submitted on the referenced project in Kay County. We concur with your opinion that the Ponca City Airport Terminal is eligible for the National Register of Historic Places under Criterion A (Economics) and Criterion C (Architecture) at the local level of significance for its association with the post-World War II economic development of Ponca City. The period of significance is 1953, which corresponds to the building's construction.

Further, we concur with your finding that the proposed project will have an **adverse effect** on the Ponca City Airport Terminal.

We welcome the opportunity to continue consultation with you to mitigate, minimize, or eliminate the adverse effect of the proposed project. However, if we are unable to eliminate the adverse effect of the project, the Federal Aviation Administration will need to contact and invite the participation of the Advisory Council on Historic Preservation (ACHP) in order to complete the Section 106 process as outlined in 36 CFR Part 800. Should the ACHP choose not to participate in the consultation, Federal Aviation Administration and the SHPO may execute a Memorandum of Agreement (MOA). Upon the execution of an MOA, a copy must be filed with the ACHP to complete the Section 106 process.

Thank you for the opportunity to review this project. If you have any questions, please do not hesitate to call Kristina Wyckoff, Historical Archaeologist, at 405-521-6381. Please reference the above underlined file number when responding.

Sincerely,

Lynda Ozan
Deputy State Historic
Preservation Officer

LO:pm

800 Nazih Zuhdi Drive, Oklahoma City, OK 73105-7917
405-521-6249 | Fax 405-522-0816 | www.okhistory.org/shpo

Oklahoma Archeological Survey

THE UNIVERSITY OF OKLAHOMA

May 1, 2023

FAA
Attn: Kelly Oliver-Amy
Environmental Protection Specialist
FAA ASW-630
10101 Hillwood Parkway
Fort Worth, TX 76177

Re: OAS FY23-1267 FAA/Ponca City Regional Airport Proposes Construction and Removal of Terminal Building (Built 1953): 2231 Waverly St., Ponca City.
Legal Description: NW ¼ SW ¼ Section 16, T26N, R2E, Kay County, Oklahoma.

Dear Ms. Oliver-Amy:

The Community Assistance Program staff of the Oklahoma Archeological Survey has reviewed the above referenced project to identify areas that may potentially contain prehistoric or historic archeological materials (historic properties). The location of your project has been crosschecked with the state site files containing approximately 26,500 archaeological sites, which are currently recorded for the state of Oklahoma. No Sites are listed as occurring within your project area, and based on the topographic and hydrologic setting, no archaeological materials are likely to be encountered. Thus, an archaeological field inspection is not considered necessary. **However, we defer opinion on the impacts to the structures older than 45 years to the Oklahoma State Historic Preservation Office (SHPO), Oklahoma Historical Society**. Please contact this office at (405) 325-7211 if buried archaeological materials such as chipped stone tools, pottery, bone, historic crockery, glass, metal items or building materials are exposed during construction activities.

This environmental review and evaluation are done in cooperation with the State Historic Preservation Office, Oklahoma Historical Society. The responsible federal agency or their official delegate must also have a letter from that office to document consultation pursuant to Section 106 of the National Historic Preservation Act. In addition to our review comments, under 36CFR Part 800.3 you are reminded of your responsibility to consult with the appropriate Native American tribe/groups to identify any concerns they may have pertaining to this undertaking and potential impacts to properties of traditional and/or ceremonial value.

Sincerely,

Ella M. Brewer-Jensen

Ella Brewer-Jensen
Staff Archaeologist

Kary L. Stackelbeck

Kary L. Stackelbeck, Ph.D.
State Archaeologist

cc: SHPO

Oklahoma Archeological Survey

THE UNIVERSITY OF OKLAHOMA

February 2, 2024

FAA
Attn: Kelly Oliver-Amy
Environmental Protection Specialist
Arkansas/Oklahoma Airports District Office
10101 Hillwood Parkway
Fort Worth, TX 76177

Re: OAS FY24-1083 FAA Proposes Removal of Terminal Building & Construction of New Terminal Building for Ponca City Airport: 2213 Waverly Street, Ponca City.
Legal Description: SW ¼ NW ¼ SW ¼ Section 16, T26N, R2E, Kay County, Oklahoma.

Dear Ms. Oliver-Amy:

The Community Assistance Program staff of the Oklahoma Archeological Survey has reviewed the above referenced project to identify areas that may potentially contain prehistoric or historic archeological materials (historic properties). The location of your project has been crosschecked with the state site files containing approximately 27,000 archaeological sites, which are currently recorded for the state of Oklahoma. No Sites are listed as occurring within your project area, and based on the topographic and hydrologic setting, no archaeological materials are likely to be encountered. Thus, an archaeological field inspection is not considered necessary. **However, we defer opinion on the impacts to the building older than 45 years to the Oklahoma State Historic Preservation Office (SHPO), Oklahoma Historical Society**. Please contact this office at (405) 325-7211 if buried archaeological materials such as chipped stone tools, pottery, bone, historic crockery, glass, metal items or building materials are exposed during construction activities.

This environmental review and evaluation are done in cooperation with the State Historic Preservation Office, Oklahoma Historical Society. The responsible federal agency or their official delegate must also have a letter from that office to document consultation pursuant to Section 106 of the National Historic Preservation Act. In addition to our review comments, under 36CFR Part 800.3 you are reminded of your responsibility to consult with the appropriate Native American tribe/groups to identify any concerns they may have pertaining to this undertaking and potential impacts to properties of traditional and/or ceremonial value.

Sincerely,

Ella M. Brewer-Jensen

Ella Brewer-Jensen
Staff Archaeologist

Kary L. Stackelbeck, Ph.D.
State Archaeologist

: dkg
cc: SHPO

Oklahoma Historical Society
State Historic Preservation Office

February 7, 2024

Ms. Kelly Oliver-Amy
Arkansas-Oklahoma Airports Dist. Office
FAA-ASW-630
10101 Hillwood Parkway
Fort Worth, TX 76177

RE: File #0877-24 [Previously #1277-23]; FAA Proposed New Terminal Project at Ponca City Regional Airport, 2213 Waverly Street, Ponca City, Kay County, Oklahoma

Dear Ms. Oliver-Amy:

We have received your correspondence dated January 25, 2024. As both the federal agency and the SHPO agree on the eligibility of the resource, we look forward to working with the FAA on a mitigation plan for the undertaking. Thank you for providing this information for our records.

We look forward to working with you in the future. For future correspondence pertaining to this project, please reference the above underlined file number. If you have any questions, please contact me at 405-522-4484. Thank you.

Sincerely,

Lynda Ozan
Deputy State Historic
Preservation Officer

LO:pm

800 Nazih Zuhdi Drive, Oklahoma City, OK 73105-7917
405-521-6249 | Fax 405-522-0816 | www.okhistory.org/shpo

A Phase I Cultural Resource Survey for the Proposed Ponca City Airport Terminal Building Replacement, Kay County, Oklahoma

By
Allison McLeod, Shawn Thomas, and Dean Afendras

Principal Investigator
Dean Afendras

Prepared for
Blackshare Environmental Solutions

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LJA Environmental Services, LLC, dba:
AFENDRAS ARCHAEOLOGY

Technical Report Number AF3273-23035

September 2024

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PROJECT DATA

Afendras Project No.:	AF3273-23035
Federal Nexus:	Federal Aviation Administration (FAA)
Review Agency:	FAA
Submitted to:	Derek Blackshare Blackshare Environmental Solutions 5109 South Wheeling Ave Tulsa, OK 74105 918-388-0970 x1001 dblackshare@blackshare-env.com
Project Name:	Ponca City Airport Terminal Building Replacement
Project Location:	NW/SW ¼ of Section 16, T26N R2E, Kay County, Oklahoma
USGS 7.5' Quadrangle:	Ponca City, Okla. 1968 (Photorevised 1979)
Project Size:	3.84 acres
Land Status:	Public
Principal Investigator:	Dean Afendras
Architectural Historian:	Kathryn Stclair
File Search:	OASIS, June 11, 2024
Survey:	Ross Campbell, Nathan Moelling, and Shawn Thomas, August 27, 2024
Report:	Allison McLeod, Shawn Thomas, and Dean Afendras, September 20, 2024

NOTICE

This is a public version of the final report. Sensitive information was redacted for public disclosure. The management version of the report contains sensitive information on archaeological sites and was prepared for federal and state agency review and is not intended for public use. Disclosure of archaeological site locations is prohibited under the National Historic Preservation Act of 1966, as amended. A management version of the report is available from the Federal Aviation Administration, the Oklahoma State Historic Preservation Office, and the Oklahoma Archeological Survey.

ABSTRACT

Afendras Archaeology completed a Phase I cultural resources survey for Blackshare Environmental Solutions, LLC of the Ponca City Airport Terminal Replacement project, Section 16, T26N R2E (~3.84 acres), southeastern Kay County, Oklahoma. Ponca City Regional Airport is proposing to replace the existing 1950s terminal building with a new one. The project is receiving funding through Federal Aviation Administration (FAA) which serves as the federal nexus. The purpose of the survey was to locate cultural resources within the area of potential effect (APE), evaluate the National Register of Historic Places (NRHP) eligibility of located cultural resources, and assess the effect the proposed improvements would have on the resources.

There are no previously recorded NRHP or Oklahoma Landmarks Inventory (OLI) properties, nor archaeological sites within or immediately adjacent to the project area. Afendras Archaeology documented the existing terminal on an Oklahoma State Historic Preservation Office (OKSHPO) Historic Preservation Resource Inventory (HPRI) form in 2023 and recommended it eligible to the NRHP under Criteria A and C. OKSHPO concurred with our recommendation and subsequently listed it on the Oklahoma Determinations of Eligibility (DOE). Currently, the FAA is coordinating with OKSHPO and other interested consulting parties to mitigate the effects of the proposed development to the Ponca City Airport Terminal building.

No additional cultural resources were documented during the survey.

Afendras Archaeology recommends that the Ponca City Airport Terminal Project will have an adverse effect on the existing terminal building, though no effects to archaeological resources. The work described in this report represents a good faith effort to identify cultural resources. However, if additional cultural features (e.g., foundations, water wells, trash pits, etc.) and/or artifacts (e.g., pottery, stone tools and flakes, animal bones, etc.) not discussed within this report are encountered during development, we advise construction personnel to cease construction then consult with the Oklahoma Archeological Survey at 405-325-7211 or oascap@ou.edu to address post-review concerns. If marked or unmarked graves, human skeletal remains, or skeletal remains believed to be human are encountered during development, all potential disturbance to the graves, skeletal remains, or associated items (e.g., artifacts, headstones, etc.) must cease and county law enforcement be notified per Oklahoma Statute § 21-1168.4.

Please note our recommendations are subject to FAA review and approval.

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INTRODUCTION

This report presents the results of Phase I cultural resources survey for Blackshare Environmental Solutions, LLC of the Ponca City Airport Terminal Replacement project, Section 16, T26N R2E (~3.84 acres), southeastern Kay County, Oklahoma (Figure 1). Ponca City Regional Airport is proposing to replace the existing 1950s terminal building with a new one. The project is receiving funding through Federal Aviation Administration (FAA) which serves as the federal nexus. The Osage Nation Historic Preservation Office requested that a cultural resources survey be completed for this project to locate and evaluate additional cultural resources. The FAA serves as the federal nexus and primary review agency.

The purpose of the survey was to locate cultural resources within the area of potential effect (APE), evaluate the National Register of Historic Places (NRHP) eligibility of located cultural resources, and assess the effect the proposed improvements would have on the resources. The Principal Investigator was Dean Afendras, MA, RPA. Oklahoma Archeological Survey (OAS) staff provided the file search data through the OAS Information System (OASIS) in a report dated June 11, 2024. The fieldwork occurred August 27, 2024, and was supervised by Ross Campbell, MA, with the assistance of Nathan Moelling, MA, and Shawn Thomas, BA. The fieldwork consisted of an inventory of the built environment (i.e., buildings and culverts greater than 45 years of age) and an archaeological survey consisting of pedestrian transects and shovel testing.

There are no previously recorded NRHP or Oklahoma Landmarks Inventory (OLI) properties, nor archaeological sites within or immediately adjacent to the project area. Afendras Archaeology documented the existing terminal on an Oklahoma State Historic Preservation Office (OKSHPO) Historic Preservation Resource Inventory (HPRI) form in 2023 and recommended it eligible to the NRHP under Criteria A and C. OKSHPO concurred with our recommendation and subsequently listed it on the Oklahoma Determinations of Eligibility (DOE). Currently, the FAA is coordinating with OKSHPO and other interested consulting parties to mitigate the effects of the proposed development to the Ponca City Airport Terminal building.

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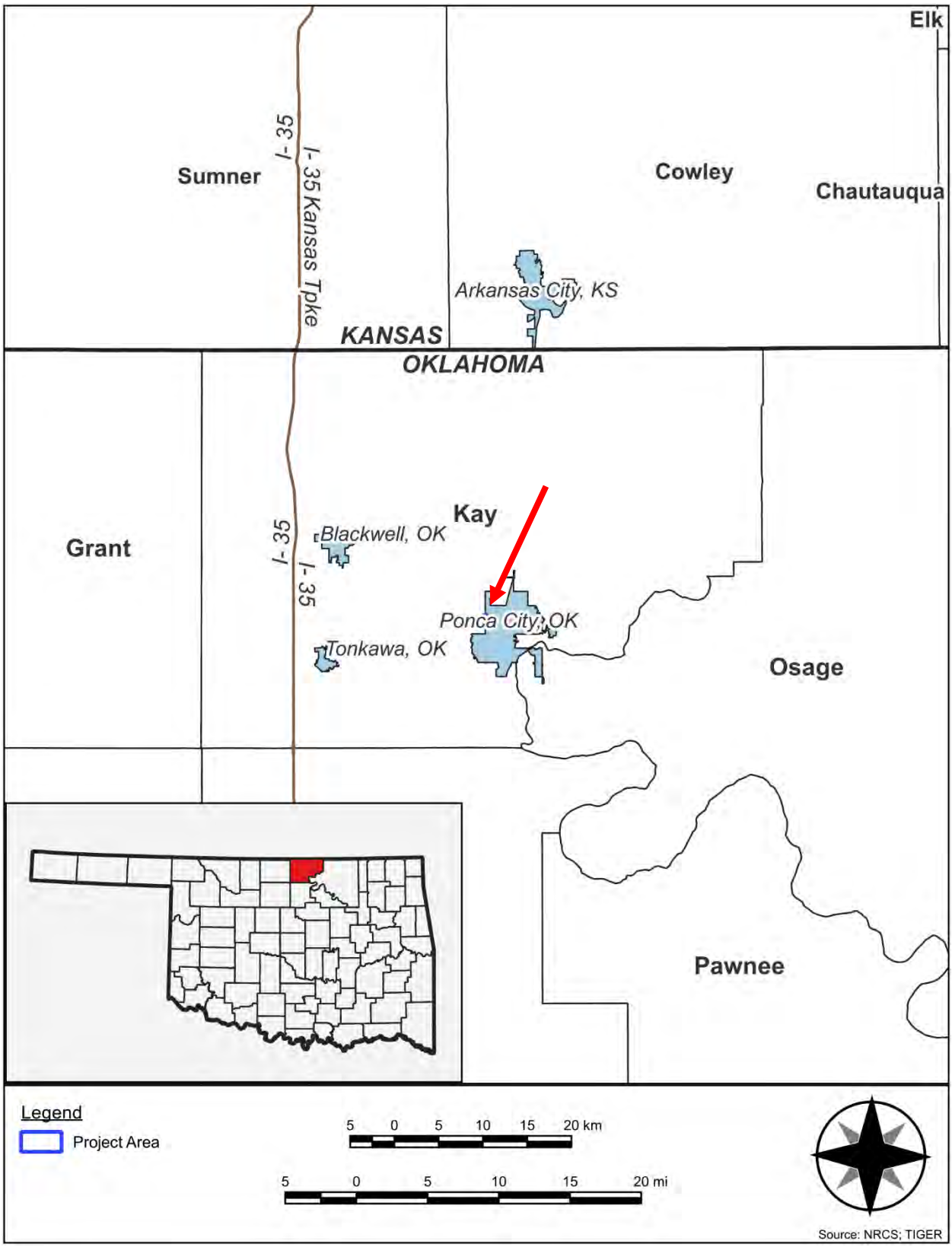

Figure 1. Project area vicinity.

PROPOSED ACTION AND AREA OF POTENTIAL EFFECT

Ponca City Regional Airport proposes to replace the existing 1950s terminal building with a new one in the NW/SW ¼ of Section 16, T26N R2E, Kay County, Oklahoma (Figures 2 – 3). The project area direct APE is a roughly rectangular block with bump-outs and includes the existing terminal, which is located at 2231 N Waverly St, in the central portion of the Ponca City Airport. The maximum dimensions of the project area are 475 feet east-west by 400 feet north-south. All work will take place within the direct APE and there are no anticipated connected actions. The project area is approximately 3.84 acres.

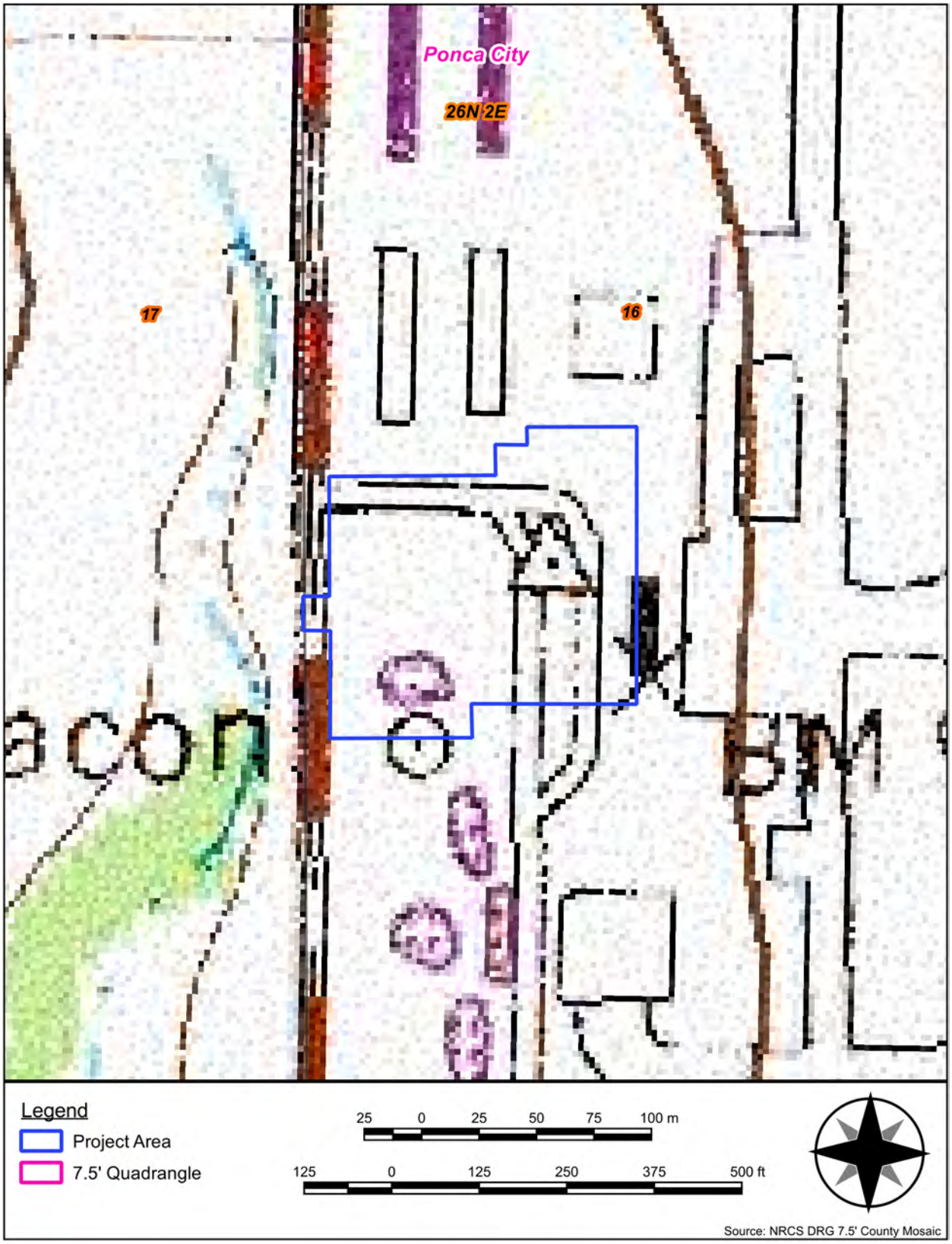

Figure 2. The project area direct APE, topographic map (Ponca City, Okla. 1968 ([Photorevised 1979])

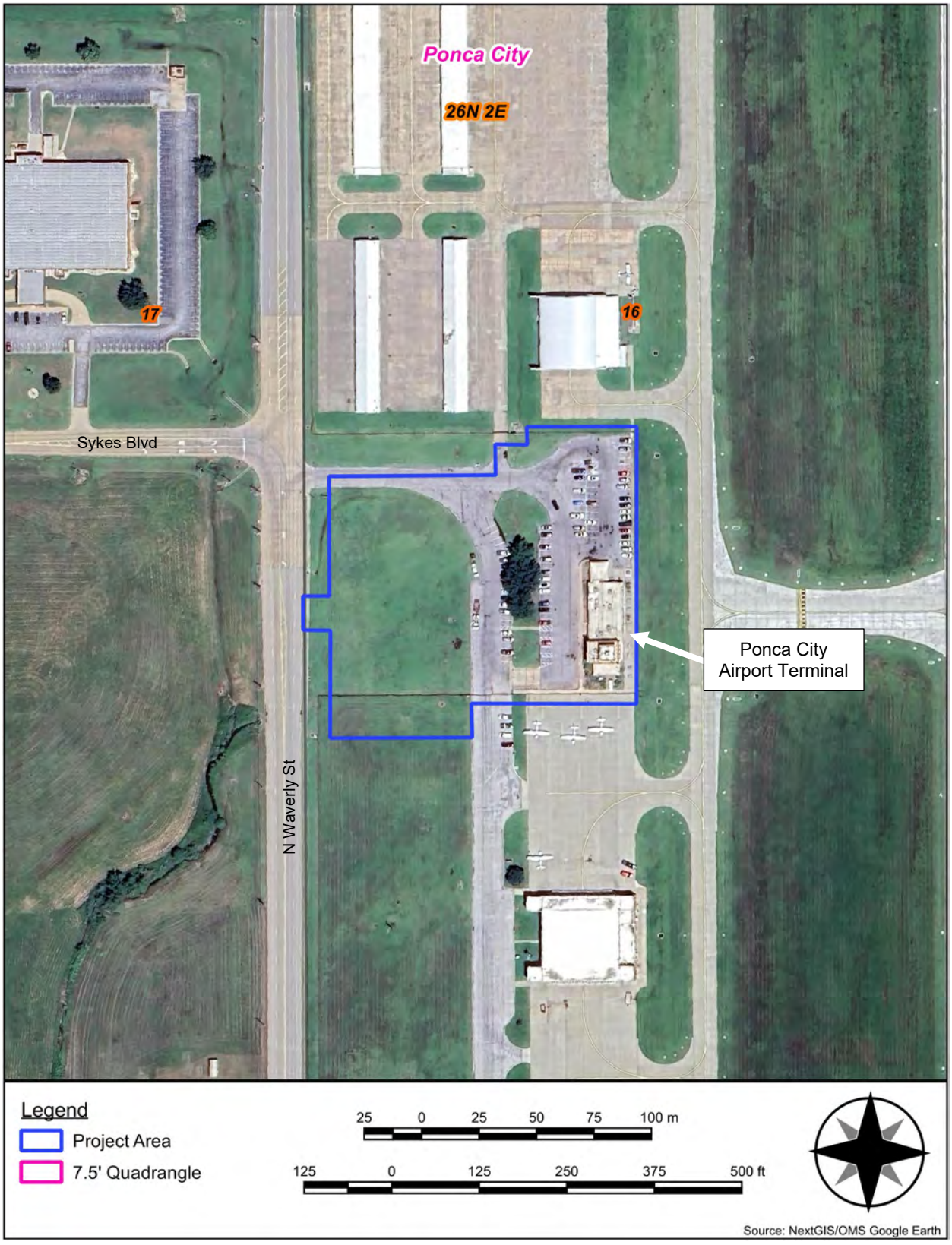

Figure 3. The project area direct APE, 2023 aerial photograph.

ENVIRONMENTAL SETTING

The project area is in the Prairie Tableland (Level IV) ecoregion, characterized by nearly level plains which historically supported open mixed grass prairie (Woods et al. 2005a). This ecoregion differs from the Cross Timbers Transition to the south, an area of rough plains covered by prairie grasses and eastern redcedar, and the Flint Hills to the east, with rugged hills, cuestas, and plains covered with tall grass prairie.

Topography

The project area is on the gentle west-facing slope of a paleoterrace, among dissected uplands overlooking an unnamed tributary of Bois d'Arc Creek (Figure 4). Elevation ranges from 1,000 feet above mean sea level (amsl) at the eastern end of the project area to 991 feet amsl on the western end, nearest the tributary.

Geology and Geomorphology

The project area is within the Central Red-Bed Plains geomorphic province, an area where "Permian red shales and sandstones form gently rolling hills and broad, flat plains" (Curtis et al. 2008). The project area is underlain by Pleistocene terrace gravel consisting of unconsolidated gravel, sand, silt, and clay on paleoterraces (Stanley and Miller 2007). Tertiary Period deposits (Ogallala Formation) consist of sand, silt, clay, and gravel eroded from the Rocky Mountains which washed over the landscape possibly extending as far as eastern Oklahoma (K.S. Johnson 2008a, 2008b). While most of these deposits have also eroded away, Ogallala Formation gravels are commonly found along present-day watercourses and relict terraces.

Lithic Resources

The locally available lithic resources in the region is generally poor quality and scattered. Local gravel outcrops can include material of the Ogallala Formation, which vary greatly in quality as knappable stone resources but are commonly found in archeological contexts (Banks 1984:71-74; 1990:94-96). Gravels from the Ogallala Formation consist of a wide variety of rock types such as quartz, quartzite, chert, and petrified wood.

To the east of the study area lays the southern extent of the Flint Hills, one of the most significant and prolific lithic raw material sources for past people in the region (Banks 1984:75-79; 1990:96-101). Most of the Flint Hills material (e.g., Wreford chert and Foraker limestone) is generally not of high quality and does not have a wide geographic distribution. However, Florence-A chert is one of the most widely distributed lithic raw material types and is commonly found in archaeological contexts on the Southern Plains (Vehik 1990:129-131). These lithic resources can be found as outcrops on limestone cuestas within 20 miles of the study area (Drass 2001; Drass et al. 2012a; Vehik 1986, 1990, 2001). Most of the activity regarding the archaeological distribution of Florence-A chert occurred after A.D. 1450 and the establishment of the Hardy quarries to extract the material.

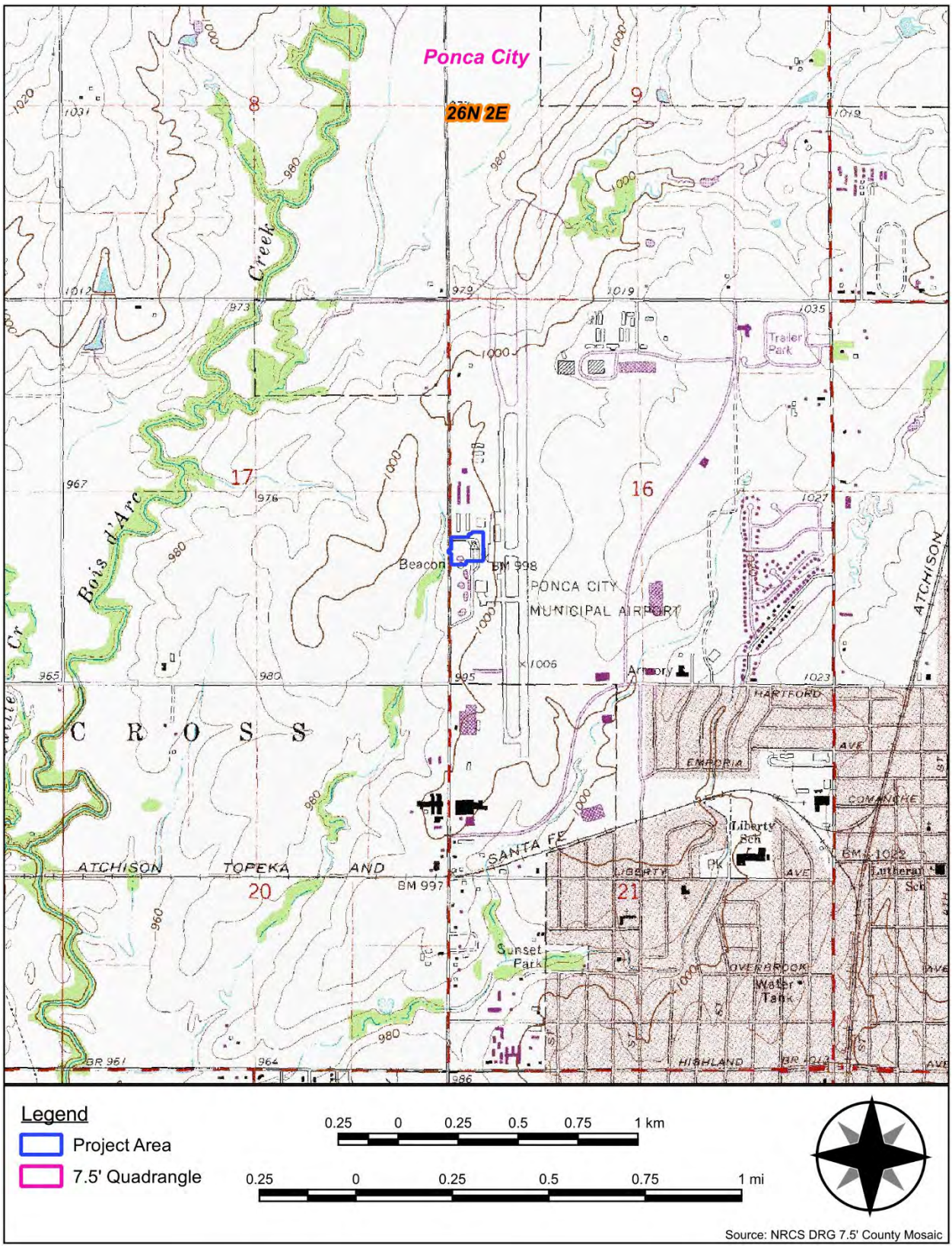

Figure 4. General area topographic setting
(Ponca City, Okla. 1968 ([Photorevised 1979])

Soils

The project area is within the Kirkland-Tabler-Bethany soil association, which consists of “deep, nearly level to moderately sloping soils that have a clayey subsoil” (Culver et al. 1967:2; General Soil Map). This association is represented within the project area by Kirkland silt loam, 1 – 3 percent slopes (U.S. Department of Agriculture, Natural Resources Conservation Service [NRCS] 2024) (Figure 5).

Kirkland series soils within the project area form on plains on paleoterraces from clayey alluvium derived from sedimentary rock (NRCS 2016). The typical profile consists of silt loam plowzone (Ap) 8 inches deep over successive horizons well-developed silty clay subsoil (Bt) exceeding a depth of 82 inches. These subsoil horizons are calcareous beginning at a depth of 28 inches, and they also exhibit slickensides from 19 – 28 inches deep. Buried surface horizons (Ab) are not noted for these series (NRCS 2024).

Hydrology

The project area drains into a tributary of Bois d’Arc Creek, with which it converges 1.7 miles to the southwest. Bois d’Arc Creek then empties into the Arkansas River 6.5 miles to the south.

Climate

The Pleistocene climate (ending approximately 11,700 years ago) was a time of mass glaciation across much of the United States, with cooler, more stable temperatures. By the Holocene (~11,650 years ago) a warming climate brought about sweeping changes in local temperatures and vegetation. The general characterization of the Holocene is one involving the formation of modern climates, plants, and animals where warming temperatures replaced the cold, moist climate of the late Pleistocene (Albert and Wyckoff 1984:32-35). This trend is evidenced in Oklahoma by pollen samples taken from archaeological sites that show a drier, less moist climate beginning to take over by the mid-Holocene (7,000 - 4,000 years ago). In northeastern Oklahoma, buried outwash fan sediments and coarse-debris slopes are evidence of erosional features typical of semiarid environments, such as the one occurring between 7,000 to 4,000 years ago (Albert and Wyckoff 1984:32-35). The mid-Holocene drier, warmer temperatures gave way to conditions supporting historically known habitats and plant communities around 4,000 years ago.

The modern climate of Oklahoma is classified as Mesothermal, of the Humid subtropical type according to the Köppen system (Christopherson 2006:Appendix B). Humid subtropical types are mild, yet seasonal, with year-round precipitation. Due to the geography of Oklahoma, continental arctic air often converges with warm, moist air from the Gulf of Mexico causing abrupt changes in conditions and severe weather (H.L. Johnson 2008). The annual temperature for Kay County ranges from 45 - 69 degrees Fahrenheit with an average of 60 degrees Fahrenheit. Average annual precipitation is 38.37 inches and occurs mostly from late March to November. The first and last freezes generally occur in October and April respectively, and the average snowfall is 8.5 inches. The average growing season is 202 days (Oklahoma Climatological Survey 2017).

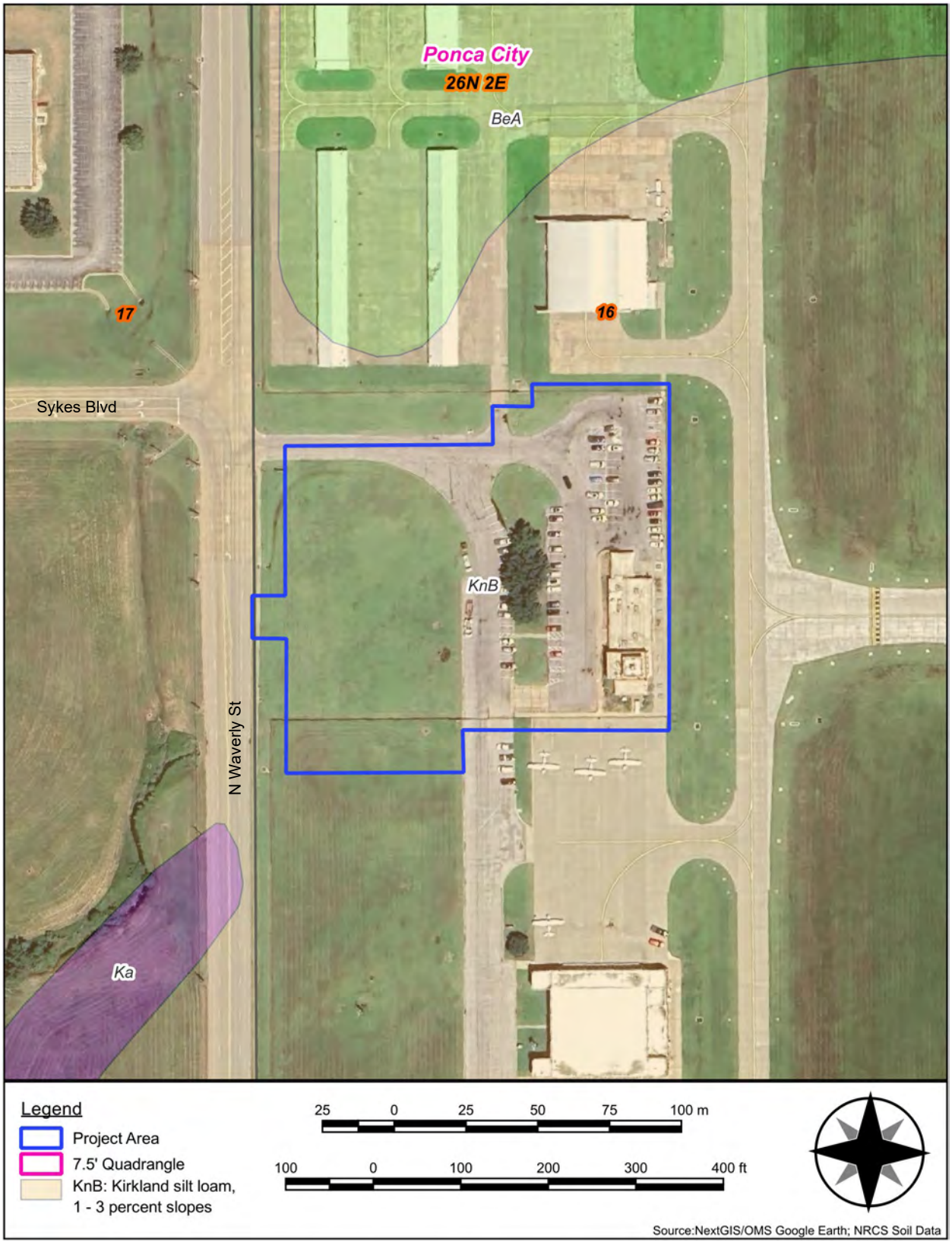

Figure 5. Soils within the project area.

Flora

The historic vegetation in the region is associated with the Tallgrass Prairie habitat type (Duck and Fletcher 1943; Hoagland 2008) and the Mixed-grass Plains biotic district (Albert and Wyckoff 1984:Table 1.2, Table 1.3, 26-28; Blair and Hubble 1938:Figure 1, 437-439). The primary natural vegetation consists of prairie grasses such as little and big bluestem, side-oats grama, blue grama, and Indiangrass, interspersed with post oak-blackjack forest (Cross Timbers) especially along watercourses and drainages. Additional trees include eastern red cedar and hickories in the uplands and cottonwood, willow, elm, ash, walnut, and pecan in riparian settings (Woods et al. 2005b). Cross Timbers forest becomes denser nearer to the Arkansas River valley where blackhaw, black oak, buck bush, redbud, and roughleaf dogwood are also common (Hoagland 2008).

In 1872 the project area was open prairie (Figure 6). By 1938 this was still the case (Figure 7). By 1954, however, the development of the airport resulted in vegetation being cleared in much of the project area in for buildings and roads (Figure 8). Some trees had been planted within patches of grass among the roads and parking areas by 1990, but one of these patches was paved over by 2013 (Figures 9 – 10). From this point, the vegetation within the project area has been unchanged (Figure 11).

Fauna

Around 16,000 years ago, Oklahoma is believed to have had a large array of megafauna including mastodon, ground sloth, giant beaver, tapir, horse, and deer. The Domebo site in Caddo County contains 11,000-year-old deposits that show gastropods, mammoth, extinct bison, extinct tortoise, bog lemming, muskrat, vole, cotton rat, and other rodents and reptiles were once common in Oklahoma (Albert and Wyckoff 1984:34). With a warming climate, many of these animals became extinct or their distribution was greatly affected and likely different than that of today.

A wide variety of fauna are historically present in the area (Albert and Wyckoff 1984 Table 1.6, 22-26; Hofman 1989a:Table 3). Bison, antelope, elk, bear, and cougar were once plentiful, but currently have restricted ranges. Deer are presently the only large free-ranging mammals in the area. Smaller animals include mammals (coyote, squirrel, fox, rabbit, ferret, opossum, badger), birds (Bob White quail, lesser prairie chicken, mourning dove, turkey, hawk), reptiles, (rattlesnake, turtle, skink), and fish (gizzard shad, bullhead, catfish, drum). Cranes, swallows, geese, and duck are common during annual migrations.

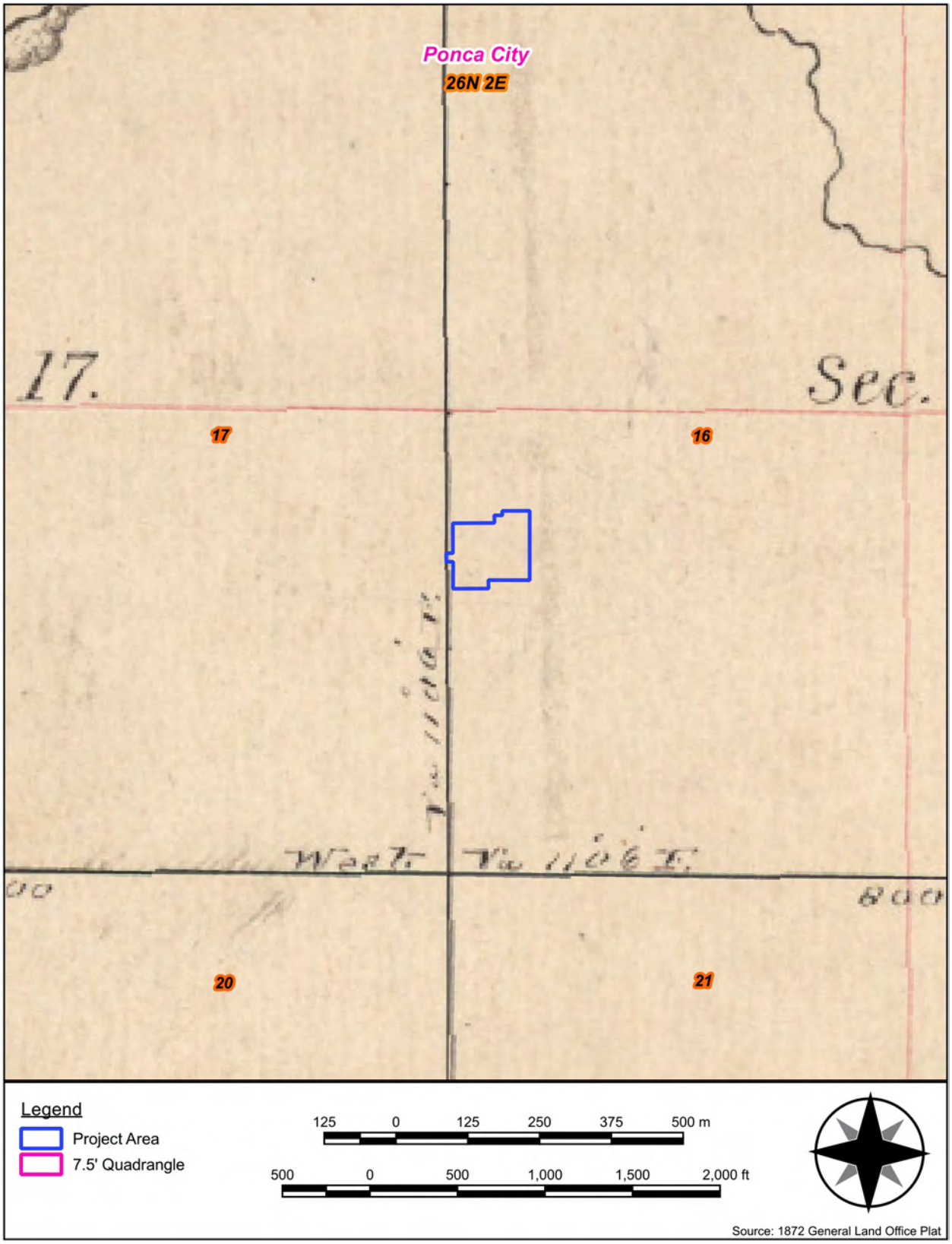

Figure 6. General area vegetation in 1872.

Figure 7. General area vegetation in 1938.

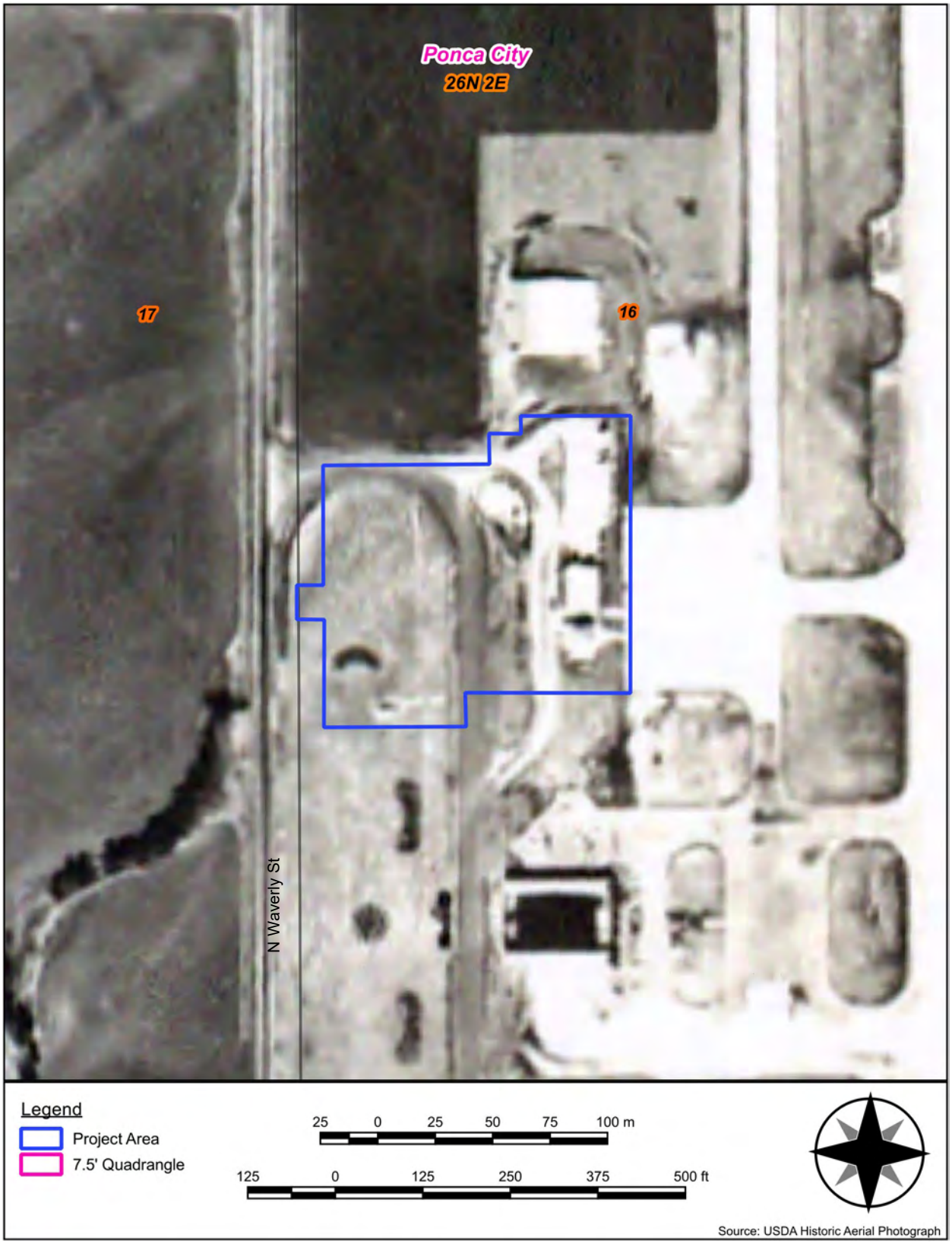

Figure 8. General area vegetation in 1954.

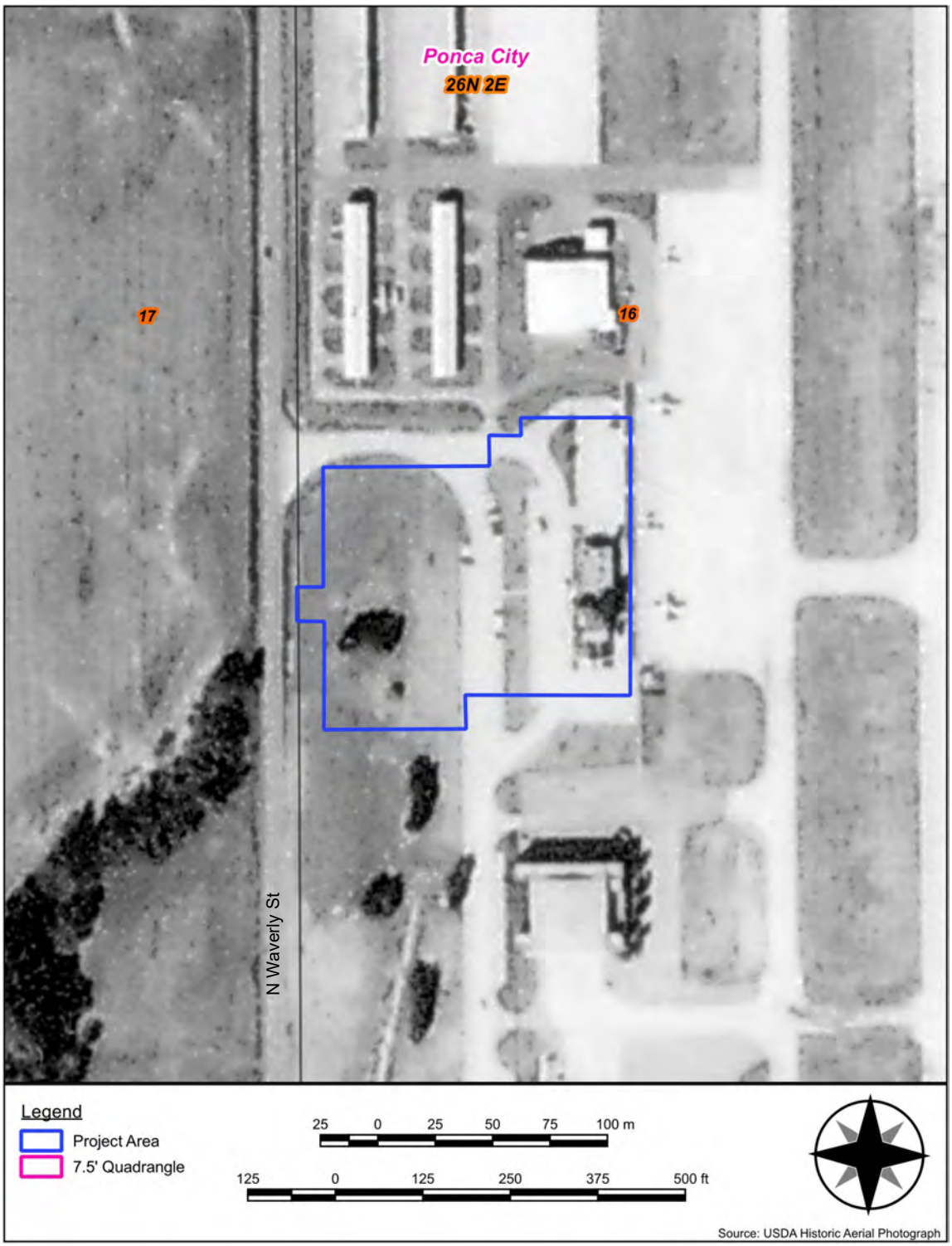

Figure 9. General area vegetation in 1990.

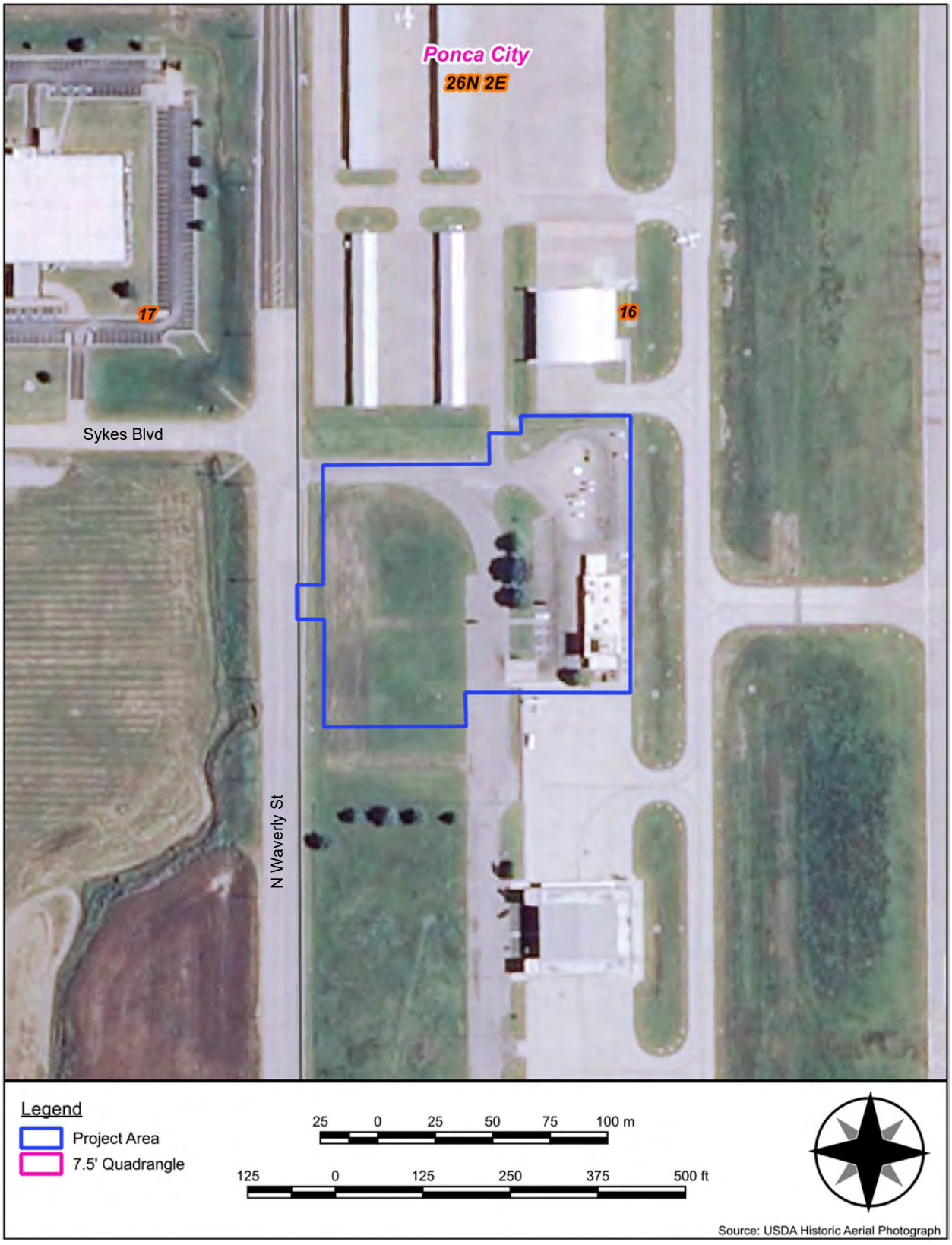

Figure 10. General area vegetation in 2013.

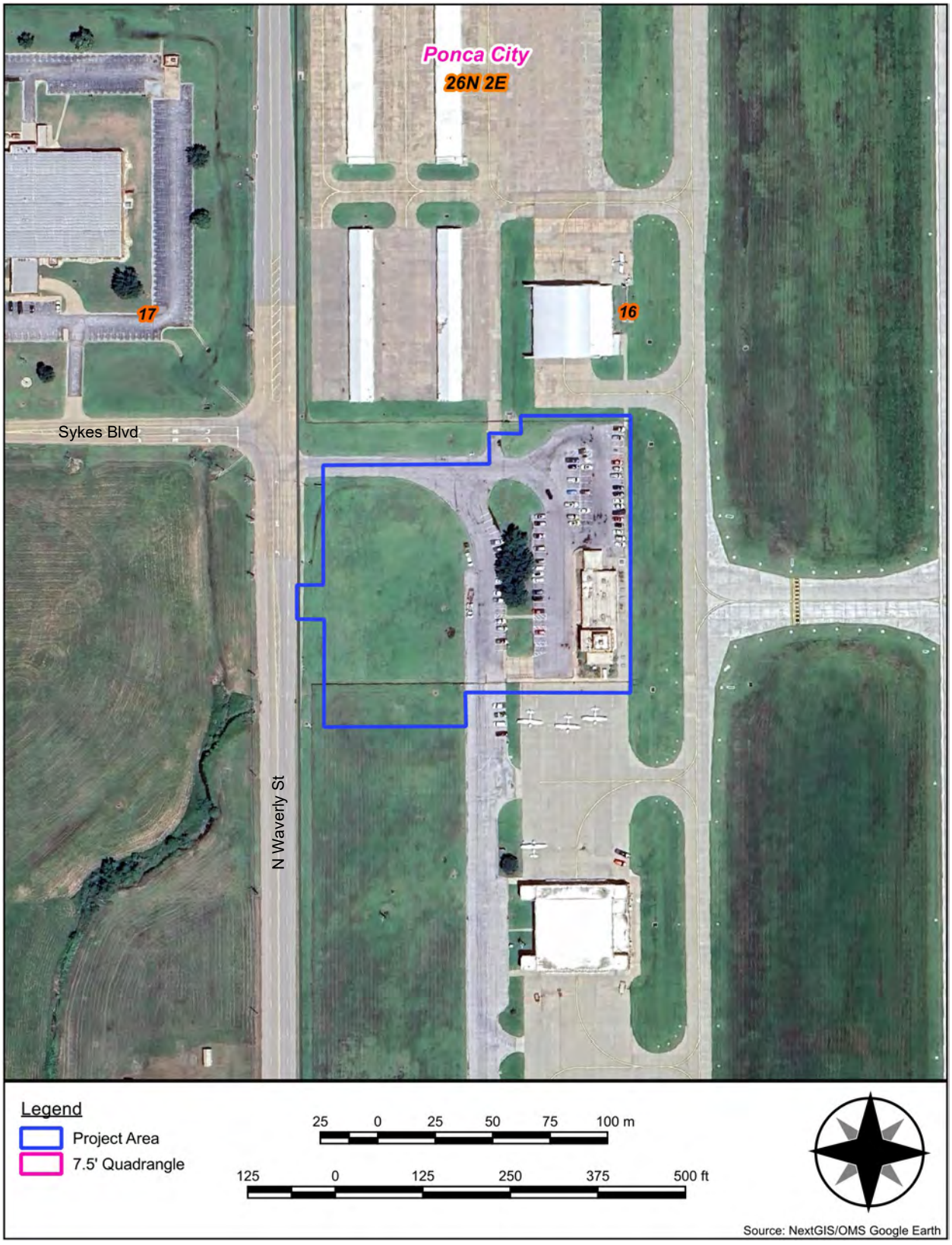

Figure 11. General area vegetation in 2023.

CULTURAL SETTING

North central Oklahoma has been the focus of numerous archaeological research investigations primarily from the 1960s through today, but as early as the 1910s (Bell 2004; Wyckoff and Brooks 1983:34-35). Most of this work has focused on specific watersheds within the region. Watershed studies in western Osage and eastern Kay counties include the Kaw Lake area (Hartley 1975; Rohrbaugh 1973, 1974; Wyckoff 1965; Young 1978), the Salt Creek basin (Neal 1973; Vehik et al. 1979), the Bird Creek basin (Drass 1985), and the Bois d'Arc Creek (Drass et al. 2014). The Salt Fork of the Arkansas River basin was the subject of a 2001 survey which included Grant and Kay counties (Drass 2001). Outside of watershed studies, an enduring area of research interest has been the extraction, use, and distribution of Florence-A chert which is at the southern end of the Flint Hills in northwestern Osage County (Buehler 1982; Drass et al. 2012b; Gould 1898, 1899, 1921; Vehik 1982, 1986, 1990, 2001, 2002, 2003). Several sites have been also excavated in the area as well supplementing and providing more detail than the general information derived from the watershed studies. Providing context for local research are syntheses of the southern Plains culture history which can be found in Bell (1984), Hofman et al. (1989), Sabo et al. (1988), and Wood (1998). These publications show that human occupation in the region extend back 12,000 years, and possibly further.

Paleoindian (12,000 – 10,500 B.P.)

The Clovis complex is currently the earliest confidently documented culture of the Paleoindian period (12,000 - 8000 B.P.) (Hofman 1989b; Hofman and Graham 1998; Sabo and Early 1988b:34-41). The growing number of sites in North and South America is suggesting "Pre-Clovis" complexes will be articulated in the future. The Cooperton mammoth kill site (21,000 - 17,000 B.P.) in Kiowa County (Anderson 1975) and the Burnham site (28,000 – 24,000 B.P.) in Woods County (Wyckoff et al. 2003) are examples of Pre-Clovis complex contenders in Oklahoma. The Paleoindian period coincides with the Pleistocene/Holocene transition (circa 12,000 B.P.) and a shift from a cool moist climate with mild winters and cool summers to one which became increasingly warmer and drier (Albert and Wyckoff 1984:34-35; Kay 1998a:21-23). The pine forests and/or parklands which extended into northern Oklahoma during the height of the last glacial advance, receded at this time and were replaced by expanding grasslands and riparian deciduous vegetation (Kay 1998a:23-25). Mammoth, mastodon, bison (*Bison antiquus*), camel, horse, and others also went extinct. Paleoindian people were likely organized as small, highly mobile, and egalitarian bands, who employed a hunter-gatherer subsistence strategy (Hofman and Graham 1998:116-122). Knowledge of these people are mainly suggested by distinctive fluted and/or lanceolate projectile points often found at the surface, megafauna kill sites, and occasional camps (Hofman 1989b:31-33). Associated artifacts include large cores, scrapers, bifaces (blades/knives), modified/utilized flakes primarily made of Edwards or Alibates, and implements of bone, ivory, and horn. Caches of points and bifaces have been found. Ground stone items are not common. There is no direct evidence for plant processing. While Paleoindian manifestations consist mainly of isolated surface finds, buried sites likely exist (Sabo and Early 1988a:36-38; Wyckoff and Brooks 1983:50).

Three Paleoindian complexes are identified in the region. People of the Clovis complex (11,500 - 10,900 B.P.) are known for fluted spear points of varying sizes as well as a variety of other stone, bone, ivory, and horn tools (Hofman and Graham 1998:93-96). The Clovis complex tends to be isolated projectile points or mammoth kill sites. While mammoth appeared to be the most important resource, a wide variety of faunal remains recovered from the Domebo site (circa 11,000 BP) in Caddo County, Oklahoma (e.g. bison, tortoise, bog lemmings, muskrat, vole, cotton

rat, and other rodents and reptiles), suggest a broader subsistence strategy (Albert and Wyckoff 1984:34-35; Hofman 1989b:32; Hofman and Graham 1998:118). Collins (2002) notes that engraved bone and stone recovered from the Gault site in central Texas are indications that art and/or symbolism were important to Clovis people.

Folsom complex (10,900 - 10,200 B.P.) people crafted a distinctive fluted spear point and participated in a mixed subsistence strategy although appeared to emphasize bison as a primary resource (Hofman and Graham 1998:97-101). Folsom people employed a much more elaborate tool kit than Clovis, centered on curation and multipurpose uses (Hofman and Graham 1998:119-120). Excavations at the Cooper site in Harper County, Oklahoma, produced a *Bison antiquus* skull with a lightning bolt painted on the top which, according to Bement (1999:176-182) suggests artistic/ritualistic behavior.

The Plano complex (10,000 - 8000 B.P.) consists of a large number of regionally specific unfluted spear points (i.e., Midland, Agate Basin, Hell Gap, Scottsbluff, Eden, Frederick, Firstview, Plainview, and Milnesand). The regional manifestations of the Plano complex tended to use more localized lithic raw materials than distant and likely indicate increasing population and cultural diversity (Hofman and Graham 1998:103-109).

Dalton (10,500 – 9500 B.P.)

Dalton and San Patrice complexes (10,500 - 9500 B.P.) represent a continuation of the earlier Paleoindian tradition, but differ from the other Late Paleoindian manifestations in that they specifically represent a Plains/Woodland border adaptation (Hofman and Graham 1998:115-116). This area allowed for access to a wider variety of resources than one region or another. The Dalton people were hunter-gatherers, but no longer hunted large game and instead sought animals like deer and smaller game while also relying on nuts, berries, and seeds. The Dalton complex is well represented throughout the eastern United States and appears in eastern Oklahoma as components mostly at rock shelter and riverine sites (Ballenger 2001; Sabo and Early 1988a:41-46). Dalton stone artifacts include lanceolate alternately beveled projectile point/knives, spokeshaves, cutting and scraping tools, ground stone abraders, perforators, and drills. Some of the tools were used for woodworking. There are also bone awls and needles. Adzes are diagnostic to the Dalton toolkit and are thought to have been used to make canoes by which the people used watercourses as thoroughfares linking the eastern Woodlands with the western Plains. Dalton artifacts on the Plains are primarily isolated surface finds.

The San Patrice complex is less well known than Dalton. The most diagnostic trait is a point which is similar to the Dalton one, but differs in its technological attributes (Jennings 2008:25-26). The complex has a more southerly geographic distribution. The toolkit is also similar but lacks the Dalton adze. The subsistence strategy appears similar, but upland settlement tends to be preferred over other settings. As with Dalton materials on the Plains, surface finds prevail, but have been found in central Oklahoma (Jennings 2008:Figure 20).

Archaic (9500 – 2500 B.P.)

The Archaic period covers a substantial period of time (9500 - 2500 B.P.). Kay (1998a:193) stated the southern Plains Archaic period is "best conceived of as a time of varied responses to a changing Holocene landscape, biota, and climate, on the one hand, and to equally dynamic hunting and gathering systems, on the other". Between 8000 - 4000 B.P., warm, arid conditions known as the Altithermal resulted in expanding grasslands and fluctuations in resources such as bison (*Bison bison*) which may have led to the abandonment of some areas on the southern Plains

by people (Albert and Wyckoff 1984:35; Hofman 1989b:45). After 4000 B.P. (through today) the climate began to ameliorate resulting in moderate temperatures, but also interspersed with drought cycles. These conditions supported biotic communities similar to today. Although the Archaic period is generally thought of as a continuation of Paleoindian adaptive strategies, these people began to subsist on a larger variety of plant and animal resources. Bison was still a significant resource, but smaller animals such as deer, elk, turkey, and raccoon were also important (Wyckoff 1984:119). The smaller notched dart points also suggest the hunting of smaller game. The large number and diversity of projectile point styles continued to increase and likely indicates increasing population and cultural diversity throughout the period. Grinding implements and burned rock middens became common at Archaic sites showing an increasing reliance on plant food resources. Archaic people apparently relied on local raw lithic materials and often thermally altered stone which improved the knappability for generally poor-quality stone such as Ogallala quartzite.

The Early Archaic (9500 - 8000 B.P.) is essentially an extension of the Paleoindian period hunter-gatherer way of life although local resources (foraging) become more important (Hughes 1984:109; Wyckoff 1984:127-130). The Packard Complex (circa 9400 B.P.) of the western Ozarks consists of small settlements on riverine and rockshelter settings yielding a variety of functionally specific tools (i.e., bone/wood working, butchering, hunting, knapping) and unfluted lanceolate points (Wyckoff 1984:134). The Gore Pit site near Lawton, Oklahoma, is one of the best documented Early Archaic sites on the Southern Plains (Kay 1998b:191-193). It consists of a burial, burned rock middens, circular basins filled with mussel shell, fire-cracked rock, charcoal, and a small amount of animal bone, ground stone, and flaked stone tools, and debitage (Hammatt 1976). However, the only diagnostic artifacts (e.g., Clear Fork gouges and Trinity, Ensor, Darl, Meserve etc. projectile points) reported for the site came from reviewing private collections. The inhabitants of this deeply buried open camp utilized local Ogallala gravels. The Gore Pit site was covered below up to 20 feet of alluvium and it is assumed that other contemporary sites are deeply buried which is the reason for the scarcity in the region (Drass et al. 2012b:14; Kay 1998b:192-193).

The Middle Archaic (8000 - 5000 BP) spans the transition between warm/arid and more moderate conditions. Calf Creek is a regional cultural manifestation during this period and found mainly as surface finds or camps on riparian settings (Drass and McKay 2006:12-13; Wyckoff 1995). Calf Creek people intensively used heat-treated Florence-A chert (Wyckoff 1995:197). The Kubik site on the Little Beaver Creek in northeast Kay County contains a deeply buried (about 6 feet deep) Calf Creek campsite. Other Middle Archaic complexes in northeast Oklahoma include Grove (A, B, and C), Tom's Brook, and Caudil, which are represented as stratified cultural deposits at a number of sites on terrace and rockshelter settings (Wyckoff 1984:135-142).

The Late Archaic (2500 - 1350 B.P.) saw the increase in number and types of sites likely demonstrating that people were becoming more localized and reliant of local resources. In addition to plant processing tools, woodworking implements also were on the rise. Technologically, the transition between the Archaic and Woodland periods was very nondescript (Hofman 1989b:45; McKay and Bement 2005b:13). To the east, in the Ozarks and Cherokee Prairie, the Lawrence Culture is the major Late Archaic manifestation, with repeatedly occupied sites found along major streams terraces (Wyckoff 1984:146-150). The Wister valley in southeastern Oklahoma contains a significant Late Archaic manifestation (Galm 1984). The pre-pottery Wister phase of Fourche Maline culture is a transitional phase between the Late Archaic into the Woodland period found in southeastern Oklahoma. Fourche Maline culture spans across modern day Louisiana into the Arkansas river basin and northeast Texas and into parts of eastern Oklahoma. Many of these sites contain burned rock middens which are thought to represent a

reliance on local plant resources (i.e., edible seeds and nuts) and the development of horticulture. Pottery and ground stone hoes are common at terminal Late Archaic sites also indicating the growing importance of sedentism and horticulture. Outside of population centers such as the Wister Valley, the technological transition between the Archaic and Woodland periods was nondescript (Hofman 1989b:45; McKay and Bement 2005a:13).

Two Late Archaic complexes are defined for western Oklahoma, the Lawton Aspect and Summers Complex. The Lawton Aspect consists of sites with stemmed and notched projectile points, Clear Fork gouges, scrapers, and expedient tools largely of Ogallala material, primarily located prominent ridges and upland settings at ancient gravel outcrops Shaeffer (1966). The Lawton Aspect covers the western half of Oklahoma and was divided into three phases and two foci, the Altus Focus, centered on Lake Altus, and the Little River Focus, centered on Lake Thunderbird. While certain artifacts, raw materials, and site topographic location has been good Late Archaic markers, the Lawton Aspect is of little utility due to lack of stratigraphic and chronological control during artifact collections (Hofman 1989b:54; Hughes 1984:111-112). The Summers complex was defined for the Summers site in Greer County which contained a rock-filled cooking pit, a hearth, a bison bone concentration, corner and basal notched dart points (includes Lange, Marshall, Ellis, Ensor, and Gary), Clear Fork gouges, bifacial knives and preforms, scrapers, pulping planes, and grinding stones (Hofman 1989b:54; Leonhardy 1966). Ogallala material was the most common tool stone, but there was also Alibates, Edwards, and unidentified cherts. Leonhardy and Hofman both state that what is known about the Summers Complex is a small part of a larger cultural system.

Eastern Woodland (2500 – 1100 B.P.)

The Woodland period (2500 - 1100 B.P.) is not well understood in much of Oklahoma due to lack of diagnostic artifacts, stratigraphic control for sites with Woodland components, and radiocarbon dates (Johnson and Johnson 1998; Vehik 1984). Another major issue is with projectile points which span the Archaic/Woodland transition and highly variable regionally specific cultural manifestations. While pottery and the bow and arrow are hallmarks of the Woodland period, they appear as additions to, rather than replacements of, the Archaic period technological repertoire (Hofman 1989b:45; Hofman and Brooks 1989:61; McKay and Bement 2005b:13). This period was moister than previous and subsequent centuries (Hofman and Brooks 1989:61). The general lack of bison at southern Plains sites has led some researchers to believe that the animals were not as plentiful at this time (Baugh 1986; Dillehay 1974). The increasing populations and cultural diversity of earlier periods resulted in decreasing mobility patterns, increasing sedentism, and increasing settlement size. One effect of the changes in mobility was the adoption of horticulture in some areas (Drass and McKay 2006:13-14).

Woodland manifestations have been identified for the northeastern, southeastern, north-central, and central portions of Oklahoma. In the northeast, there are three distinct foci, Delaware A, Cooper, and Delaware B (Vehik 1984). The Fourche Maline phase of the Ouachita Mountains is the pottery-bearing phase of the Fourche Maline culture and is a continuation of the earlier Wister phase (Galm 1984). Woodland sites excavated in north-central Oklahoma include Hudsonpillar, Freeman, and Von Elm, but no foci have been identified (Bastian 1969; Hartley 1974; Vehik 1984:192). In central Oklahoma, the Pruitt complex is transitional between the Late Woodland and later Village Farming societies (Hofman and Brooks 1989:67-68; Vehik 1984:192-195).

Mississippian (1100 – 500 B.P.)

The Neosho River is at the boundary of two roughly contemporaneous cultural areas, the Mississippian to the east and Plains Villagers to the west. Similar to the Woodland tradition, Mississippian culture was widely represented throughout the eastern United States. The Mississippian period (1100 – 500 B.P.) is indicated by increased social complexity, elaborate religious practices, platform mound centers, extensive trade networks, and intensive cultivation of maize. The Arkansas Valley Caddoan variant, which is derived in part from the Fourche Maline Phase, included four successive phases (Sabo and Early 1988a:82, 99, 103-120). The Harlan phase represents the earliest expansion of Mississippian traits into the region and culminates during the Spiro phase. The hierarchical societies responsible for maintaining the Mississippian way of life were dissolving at the end of the Spiro phase. The Fort Coffee phase centered along the Arkansas River southwest and south of the Ozarks while the Neosho phase is found along the Neosho River west of the Ozarks. Both phases are known for increasingly smaller and dispersed hamlets as opposed to much more concentrated settlements of previous phases. The people of these phases also began to take on characteristics indicative of their Plains dwelling neighbors and would eventually become archaeologically indistinguishable (see Rohrbaugh (1982)).

Plains Village/Late Prehistoric (1100 – 300 B.P.)

The Plains Village period (1100 - 300 B.P.) represents a continuation and intensification of later Woodland traits (Drass 1998; Hofman 1989c). This period coincides with a climatic shift from cooler and wetter conditions to a warmer and drier environment (Brooks 1989:75). The Plains Village period is known for large semi-permanent communities concentrated in river valleys and their tributaries. The people resided much of the year in permanent villages raising domesticated crops, notably maize, beans, sunflowers, pumpkins, and squash. The remaining time was spent away from the community on extended long-distance bison hunts requiring most if not all community participation. While agriculture and bison-hunting appear to have been the most important food procurement strategies, a wide range of wild plant resources were foraged, and terrestrial and aquatic fauna were also hunted, caught, or trapped. The people of this period also enjoyed extensive trade networks which had been in existence prior to European contact.

Until 500 B.P., several distinct Plains Village manifestations had developed throughout the region (Drass 1998:Figure 12.11). The Paoli and Washita River phases of the Redbed Plains Variant were in central Oklahoma, stretched out mainly along the Washita River. The Uncas complex, represented by the Uncas site on the banks of Kaw Lake, has distinctions which suggest a central Plains Tradition affiliation (Galm 1979). These and other early Plains Village cultures had very dispersed settlement patterns. After 500 B.P., Plains Village people began coalescing into large, often fortified villages. Conflict (Vehik 2006:209), immigration (Drass 1998:447; Hofman 1989c:95; Vehik 1994), the environment (Hofman 1984:323), and fluctuating distribution of bison (Baugh 1986; Dillehay 1974) are all cited as possible reasons for the coalescence of Plains Village people. These people contributed to population centers such as the Great Bend aspect in central Kansas (Little River focus) and north-central Oklahoma (Lower Walnut focus) and the Wheeler and Edwards complexes in western Oklahoma and were the groups encountered by Europeans such as Francisco Vásquez de Coronado in 1541, Juan de Oñate in 1601, and Jean-Baptiste Bénard, Sieur de la Harpe in 1719 (Drass 1998; Vehik 1992:326-328; 2006:209).

Protohistoric (500 – 200 B.P.)

In the decades preceding European contact (ca. A.D. 1541), major changes were taking place in response to movements of people across the Plains. Athapaskan speaking people (Apache and

Navajo) began migrating south along the western High Plains a century earlier causing eventual relocations of Cheyenne, Arapaho, and Kiowa from the northern to southern Plains (Vehik 1994). Additionally, Dhegihan speaking people such as the Osage were beginning to make more concerted efforts to establish hunting grounds on the Plains and in eastern Oklahoma (Bailey 2001:476-477; Hofman 1989c:95). After European contact, diseases likely spread through the region further deteriorating an already contentious and worsening situation (Drass 1998:447; Vehik 1994:Table 11.15).

European Trade and Exploration

The Spanish were the first Europeans to pass through, explore and claim sovereignty over the region. They had been exploring what would become the western half of Oklahoma since 1541. These Conquistadores pursued rumors of the fabled cities of gold onto the Plains prompting several expeditions. Missionaries also accompanied the soldiers hoping to convert the indigenous people to Catholicism. However, because the Spanish were not interested in open trade relations with the Native peoples they encountered, their foothold on the region was largely in name only (Goble 2006c; Hoig 1998:18). Therefore, as comparative latecomers to the Spanish, the French had much more success in working with the indigenous people.

The French did not make any concerted efforts into the region until the early 1700s although Rene-Robert Cavelier, Sieur de la Salle had claimed Louisiana in 1682 in the name of France which included the project area. The French were not preoccupied with dominance and religious conversion, per se, but rather economics and so freely traded and often lived with Native people. In fact, the French often acted as mediators in order to resolve conflicts between different tribes, so trade could be more prosperous. Due to close and often disputed borders, the relationship between the Spanish and French was tense, prompting both sides to construct forts, establish alliances with tribes, and become involved in proxy conflicts (Goble 2006b; Hoig 1998:33-34, 40-42, 48-51).

The French trader La Harpe entered into southeastern Oklahoma and made his way north across the Ouachita Mountains to the Arkansas River near present-day Tulsa in 1719 (Goble 2006c). After encountering groups of Caddo and Osage during the trek, La Harpe was received into a settlement consisting of what appears to be a confederacy of Wichita bands (Hoig 1998:33-38). This settlement was near the Three Forks region, at the confluence of the Arkansas, Neosho/Grand, and Verdigris Rivers. The ability of the French to interact peacefully with a variety of tribes towards mutually beneficial outcomes would continue in the Three Forks area and the region over the next century setting the stage for subsequent trade and exploration expeditions. Furthermore, the Three Forks area became a starting point for trade between Louisiana and Plains peoples which remained strong through the mid-1700s (Smith 2000:25). Notable individuals include the traders Pierre and Paul Mallet in 1740 and later in 1741 accompanied by the emissary Fabry de la Bruyère who traveled along the Canadian River hoping to establish a viable route between French Louisiana and Santa Fe in Spanish New Mexico (Goble 2006c; Hoig 1998:42-43). A short-lived post was also established in the area by the fur trader Jean Pierre Chouteau circa 1800 with the goal of active trade relations with the Osage who were at that time the dominant Native American group in an area covering southern Missouri, southeastern Kansas, northern Arkansas, and northeastern Oklahoma (Bailey 2001:Figure 1; Hoig 1998:46). Between 1839-1839, Auguste Pierre Choteau established a trading post at Camp Holmes/Mason, on Choteau Creek north of present-day Lexington, to trade with the Plains tribes (Foreman 1957; Hoig 1998:220; Lovett 2006).

Louisiana and Indian Territories

Until 1803, with the United States acquisition of the Louisiana Purchase from France, control of the region passed between Spain and France (Baird and Goble 2008:44-45; Gibson 1990:20; Goble 2006b; Hoagland 2006). In the early 1800s, several American explorers traversed the region documenting the environment and the local populations (Baird and Goble 2008:47; Stout 1976:5). The Arkansas River served as a major thoroughfare as well as a launching point for heading further west (Hoagland 2006). In many cases, reports of the region did not portray a favorable environment for farming (Baird and Goble 2008:60). Major Stephen H. Long described the region as the "Great American Desert," unsuitable for agricultural activities (Baird and Goble 2008:52; Smallwood 1976:60). During the early 1800s, the major Anglo-American settlement consisted of forts and trading posts (Hayes et al. 1989:106). Forts were used as a means of pacifying and protecting various groups of people. This was largely due to the increasing competition for resources on the southern Plains. In response, hostilities raged among tribes and between tribes and the United States.

In the eastern United States, Anglo-American and Native American tensions had simmered for many years periodically erupting into conflict. President Jefferson hoped to use a portion of the newly acquired Louisiana Purchase to resettle the eastern tribes thus opening more land east of the Mississippi for Anglo-American settlement (Baird and Goble 2008:75). While the Osage had used their trade advantage over Plains tribes like the Wichita, Caddo, and Pawnee, eastern tribes were beginning to press into Osage territory (Bailey 2001:477). Included within this group, the Cherokee had been moving into northern Arkansas since the late 1700s resulting in conflict with the Osage. The United States policy had been set to push the tribes west, the Osage were slowly forced to cede lands. Through a series of treaties in 1808, 1818, and 1825, the Osage had been relocated to southern Kansas (and eventually back into Indian Territory after 1872 in present-day Osage County). From 1829 until 1842, the United States relocated the Choctaw, Cherokee, Chickasaw, Muscogee (Creek), and Seminole into Indian Territory. After reestablishing themselves in Indian Territory, many members of southeastern tribes continued their previous lifestyles including as plantation owners and slave holders. This placed them more inline economically with the South and would have significant results during and after the Civil War.

Indian Removal

The portion of Indian Territory which contains the project area was originally part of the land granted to the Cherokee Nation (Green 2006b). Negotiations held in 1808 and 1817 led to Cherokee migrations to Arkansas from their homelands in the east surrounding Appalachia, but conflicts with the organization of Arkansas and further expansion of white Europeans drove many of the Cherokee into Texas (Green and Goble 2006). In 1839, the army of the Republic of Texas drove most of the Texas band of Cherokee north across the Red River. The eastern band of the Cherokee drafted a constitution in 1827, led by Principal Chief John Ross who fought for the survival of the Cherokee Nation. But in 1830 the Indian Removal Bill became law under President Andrew Jackson. Seeing no hope for the Cherokee in the east, Major Ridge, John Ridge, Elias Boudinot and Stand Watie signed the Treaty of New Echota, ceding all Cherokee lands in the east and agreeing to move into Indian Territory (Green and Goble 2006:57). When the first of the Cherokee arrived at their assigned lands in 1828, they found a large population of Creeks on both sides of the Verdigris River in a portion of land at the Three Forks area. The faulty information about tribal boundaries led to a federal commission to intervene to change the boundaries, as both tribes refused to cede the land (Green 2006b). The new boundary gave the Verdigris and Arkansas river valleys to the Creeks, with the Cherokee boundary to the east of the Neosho River near Fort Gibson (Agnew 2022).

Civil War and Reconstruction

When the Civil War broke out in 1861, like elsewhere in the United States, the citizens of the Choctaw, Chickasaw, Cherokee, Muscogee (Creek), and Seminole Nations were divided. However, the tribes officially allied with the Confederacy (Baird and Goble 2008:107). The agricultural lifestyle and pro-slavery stance more closely resembled those of the Confederacy, who also offered them protection and the resumption of annuity payments (Debo 1979:145-146). Most of the action in Indian territory revolved around guerilla attacks designed to interrupt transportation of supplies to the military forts (Baird and Goble 2008:110). John Ross, Principal Chief of the Cherokee sought neutrality, but in 1861 the United States abandoned the forts established across Indian Territory, leaving the local populations vulnerable to attack (Moulton 2009). At the beginning of the war, Ross was voluntarily captured by the Union troops and spent the majority of the war in Washington D.C. negotiating with the United States, though he had signed the treaty with the Confederacy (Moulton 2009).

In 1862 and 1863, the Union soldiers were sent into Indian Territory to take control of the area from the Confederacy. The battle of Honey Springs, along the northern border of present-day McIntosh County, was one of the largest and most defining battles within the territory. The engagement was a turning point for the Union Troops, which eventually led them to secure important strategic forts, Fort Gibson and Fort Smith. After this success, most of the action within Indian Territory was limited to raids and other guerrilla warfare tactics. Also, a portion of the population fled to the south toward the Red River (Baird and Goble 2008:107-110; Wright and Fischer 1967:37-38).

With the defeat of the Confederacy, the Indian Territory tribes once again signed treaties with the United States which resulted in, among other things, reducing their territory, abolishing slavery, and allowing railroads to construct lines within the borders of their nations (Green 2006c; Hubbell 1980:110). As railroads were constructed through the Nation, railroad towns were established at the ends of the tracks, bringing outlaws and other nefarious characters into the area. Another development concerned the longhorn cattle in Texas, which had had amassed greatly during the war. Texas cattlemen, looking to enlarge the market which had been flooded with surplus cattle, began to move their cattle northward through the Indian Nations to the nearest railroads in Kansas (Drago 1965:28). The Shawnee Cattle Trail roughly followed the path of the Osage Trace/Texas Road from the early 1800s. However, the exact route of the trail is uncertain as each trail driver utilized their own route and the main line fluctuated in various accounts (Drago 1965:91). This trail was initially the Texas Road, a heavily utilized road through the region prior to its existence as a cattle trail (Drago 1965:30). The Cherokee leased the Cherokee Strip to Texas cattlemen, who would transport their cattle to the railhead in Kansas and then on to market (Gibson 1990:87). Cattle trails were a major reason for the construction of railroads. The formation of an extensive rail network led to the abandonment of trails, but also made travel within the territory and between territories easier.

The new treaties also allowed for the former territory of the Five Tribes to be sub-divided to provide land for other tribes which the U.S. government wanted to relocate to Indian Territory. An 1866 treaty resulted in the government selling new lands to the Cherokee in exchange for the Cherokee allowing the Osage and Kaw (or Kansa) to settle in the Cherokee Outlet. The Cherokee agreed, and the government moved the Osage and Kaw between the Arkansas River and the 96th Meridian (Green 2006a).

Allotment, Anglo-American Settlement, and the Move Towards Statehood

During the Civil War, the United States passed the Homestead Act, which allowed citizens to settle on a 160-acre tract of publicly owned land to establish a farm and eventually own the land outright (Baird and Goble 2008:142). The promise of this legislation led a group of speculators to attempt to force the government to open the Unassigned Lands in Indian Territory for settlement. This effort, the Boomer Movement, was led by C.C. Carpenter in 1879, David L. Payne from 1880 until his death in 1884, and William L. Couch in 1884 (Ruth 1957:33). This effort had the support of the railroad industry, both politically and financially (Hubbell 1980:115). Primarily under Payne's leadership, groups of settlers would sneak across the border into the Unassigned Lands and establish a settlement. However, they were removed from the territory by the military on each occasion (Rister 1942:54). While the Boomer Movement received support from the railroad companies, there was also opposition from the cattlemen who had established a strong presence in the region (Rister 1942:117).

In 1885, Congress passed an act, opening the Unassigned Lands not designated for any of the tribes, for settlement by prospective settlers. This act also authorized the government to start negotiating with the tribes to purchase their surplus lands. In 1889, the first land run brought immigrants into those areas. Congress passed the Organic Act the next year, officially creating Oklahoma Territory (Hubbell 1980:115). In 1898, Congress passed the Curtis Act, which led to the dissolution of the tribal governments and the creation of citizenship rolls of the five main tribes within Indian Territory (Debo 1991:33). The creation of the rolls was met with resistance from the people who refused to accept the end of the tribal sovereignty. They refused to share the existing records and legislation and fought to keep people off of the official rolls (Debo 1991; Carter 1999:39). For example, in 1901, Chitto Harjo (Creek) established an independent traditional tribal government that passed legislation making it illegal to participate in allotment, rent from, or employ non-tribal members (Debo 1979:376; 1991:295). He and his followers punished the others they believed to have broken their laws. Federal officials were sent to arrest participants in Harjo's government (Baird and Goble 2008:158).

The Cherokee were also put under much pressure to sell their lands, but they were reluctant as leasing lands in the Cherokee Outlet to cattlemen had become profitable for them (Green 2006a). President Benjamin Harrison therefore enacted Proclamation No. 10, which stated that the Cherokee Nation had no legal right to lease lands in the Outlet, thus nullifying all of their lease agreements (Clough 2006a). This loss of income pushed the Cherokee to sell their land to the U.S. Government, just as Harrison had wanted. The Cherokee Outlet was opened to settlers in 1893, with a land run taking place (Clough 2006a).

Ponca City was established in 1893 when the Cherokee Outlet was opened for settlement. The original county designation was "K County" with Newkirk designated as county seat; elections were held in 1894. The land ceded to the Ponca, situated around the confluence of the Arkansas River and the Salt Fork of the Arkansas River, were allotted in 1904. By statehood, the newly formed Kay County included the previous K County boundaries in addition to the former Ponca and Kaw reservations (Wilson 2024).

By the end of the 1890s, statehood seemed inevitable. However, it was not certain if one state or two would be created out of Oklahoma and Indian Territories (Maxwell 1950:162). In 1905, advocates for the creation of two separate states met at Muskogee in the Hinton Theater. There they developed a constitution and government for what they hoped would become the state of Sequoyah, which would include all of the Indian Territory. That same year a convention was held in Oklahoma City by proponents of a single state (Maxwell 1950:178). Ultimately, the United

States Congress passed the Enabling Act in 1906 establishing one state of the two territories (Maxwell 1950:330).

Statehood

When the state of Oklahoma was created from the twin territories, Oklahoma and Indian, in 1907, a symbolic wedding depicting the two territories took place in Guthrie, the first designated state capital (Bennett 2013:29; Gibson 1990:125). The organization of the territories into the state of Oklahoma began with the organization of Recording Districts in 1906 followed by counties in 1907 and statehood (Goble 2006a). Kay County was part of the Cherokee Outlet, which was opened to settlers in 1863, and it was originally designated K County with Newkirk as the county seat (Wilson 2024). Despite the prominent ranches within the county, agriculture was the primary economic driver, with over 600,000 acres of farmland by 1908. Wheat, corn, alfalfa, and oats were the primary crops. The rich, deep soils of the area are conducive to growing winter wheat, grain sorghum, alfalfa, and soybeans. However, following the discovery of oil near Newkirk in 1894, the economies of Kay County and Ponca City were inextricably tied to the oil and gas industry. Census data for Ponca City for 1900 - 1980 bears witness to this (Ponca City Historic Preservation Advisory Panel N.D.:12; Wilson 2024). Two periods of population spikes are recorded in the census data; one spike in the 1920s and 1930s (179.7 and 128.8 percent increases respectively) and the other in the 1950s and 1960s (20.2 and 21.1 percent increases respectively). The first period begins with the oil boom, and its decline coincides with the bust associated with the onset of the Great Depression. The second period coincides with increasing activity at the Conoco-Philips facility in Ponca City. The energy industry, along with agriculture, continues to be the economic mainstay of Kay County (Wilson 2024).

The Ponca City Municipal Airport was established in 1930 to serve the local community, especially those associated with the flourishing oil and gas industry (Denson 2009; Wilson 2024). The airport expanded during World War II when the Darr School of Aeronautics was created to train British Royal Air Force pilots (Bays et al. 2017:38-39). The post-war years saw the airport revert back to supporting the local economic growth. In 1953, during the second population boom and fueled by the success of the oil and gas industry in Ponca City, the Ponca City Airport Terminal was constructed and served to host the influx of people moving and traveling to the area (Denson 2009; Ponca City Historic Preservation Advisory Panel N.D.:12; Wilson 2024).

PREVIOUS CULTURAL RESOURCES AND ARCHIVAL RESEARCH

The following sections present the results of the archival and background research completed prior to fieldwork. A 1-mile area of interest (AOI) was established for the purposes of this review, with the exception of a 3,000-foot AOI established for OLI properties. The smaller AOI for OLI properties includes the entirety of the Ponca City Airport with a buffer but excludes the abundant properties further within Ponca City.

Prior Research and Results

Previous Investigations

According to the OASIS report received on June 11, 2024, [REDACTED] Section 106 surveys have been completed within one mile of the project area (Table 1).

Table 1. Cultural resources surveys within 1-mile AOI.

[REDACTED]

Previously Recorded Cultural Resources

Afendras Archaeology documented the existing terminal on an OKSHPO HPRI form in 2023 and recommended it eligible to the NRHP under Criteria A and C. OKSHPO concurred with our recommendation and subsequently listed it on the DOE. There are no other previously recorded properties listed on the DOE within one mile of the project area (OKSHPO 2024a).

Two NRHP properties are within one mile of the project area, and six OLI properties are within 3,000 feet of the study area (OKSHPO 2008, 2024b) (Tables 2 – 3; Figure 12). Both NRHP properties are cross listed on the OLI. All but one of the OLI properties (#105008) are associated with the Ponca City Airport. According to the OASIS report received on June 11, 2024, there are [REDACTED] archaeological sites within one mile of the project area (Table 4; Figure 12).

Table 2. NRHP properties within 1-mile AOI.

Listing	Property Name	Description	Eligibility	Dist/Dir (ft)
RS100004173 (OLI #101059)	Ponca City Municipal Airport Hangar	Art Deco hangar built 1930 – 1932. Significant under Criterion A for economics is it "symbolized the strong economic relationship between a burgeoning aviation sector and Oklahoma's oil industry" (2018 NRHP Form). Also significant for military as a part of the WWII British and American pilot training program with the Darr School of Aeronautics 1941 – 1944.	A	280 S
06000794 (OLI #102090)	Darr School of Aeronautics Hangar No. 3	Steel, closed arch truss hangar built in 1942, significant under Criterion A for military and economics, and under Criterion C for architecture for the period of 1942 – 1944. The hangar was originally built for the WWII British and American pilot training program with the Darr School of Aeronautics (1941 – 1944) and was subsequently part of the Ponca City Airport during post-WWII economic growth of the city. It is also an example of WWII-era-era prefabricated airplane hangars.	A, C	2,450 NE

Table 3. OLI properties within 1-mile AOI.

Listing	Property Name	Description	Eligibility	Dist/Dir (ft)
101059 (NR #RS100004173)	Ponca City Municipal Airport Hangar	Art Deco hangar built 1930 – 1932. Significant under Criterion A for economics is it "symbolized the strong economic relationship between a burgeoning aviation sector and Oklahoma's oil industry" (2018 NRHP Form). Also significant for military as a part of the WWII British and American pilot training program with the Darr School of Aeronautics 1941 – 1944.	A	280 S
102087	Ponca City Airport Building Foundation	Slab foundation of former WWII building constructed in 1942	Not eligible	2,950 NE
102088	Ponca City Airport Building Center Hangar	Round-roofed rectangular airplane hangar constructed in 1942	Not eligible	2,670 NE
102089	Ponca City Airport Building East Hangar	Round-roofed rectangular airplane hangar constructed in 1942	Not eligible	2,900 NE
102090 (NR #06000794)	Darr School of Aeronautics Hangar No. 3	Steel, closed arch truss hangar built in 1942, significant under Criterion A for military and economics, and under Criterion C for architecture for the period of 1942 – 1944. The hangar was originally built for the WWII British and American pilot training program with the Darr School of Aeronautics (1941 – 1944) and was subsequently part of the Ponca City Airport during post-WWII economic growth of the city. It is also an example of WWII-era-era prefabricated airplane hangars.	A, C	2,450 NE
105008	Smith International	Manufacturing facility, steel building built 1950	Not assessed	2,800 S

Table 4. Archaeological sites within 1-mile AOI.

[REDACTED]

[REDACTED]

Figure 12. Previously recorded resources within the 1-mile AOI.

Survey of Archival Material

Table 5 lists the available maps and aerial photographs reviewed during background research. The purpose of reviewing this information was to determine the presence of potential historic-period resources (PHRs). PHRs are buildings, structures, and other cultural features visible on historic maps and aerial photographs within or immediately adjacent to the project area indicating a high probability of encountering them during fieldwork (cemeteries marked on reviewed maps are included regardless of age). If found during fieldwork, PHRs would need to be appropriately documented as a cultural resource (e.g., site, building) and evaluated for NRHP eligibility.

Table 5. Available documents reviewed during background research.

Year	Document	Source
1872	T26N R2E survey plat	General Land Office
1968, 1979	Ponca City 7.5' quadrangle	U.S. Geological Survey
1910	Kay County plat atlas	George A. Ogle & Company
1915	Kay County soil map	U.S. Department of Agriculture
1925, 1931 (rev. 1947)	Fire insurance map	Sanborn Map Company
1936, 1936 (rev. 1937), 1953 (rev. 1957), 11953 (rev. 1958), 1963 (rev. 1968), 1969 (1972), 1976 (rev. 1977), 1976 (rev. 1983)	Kay County highway map	Oklahoma Department of Highways/ Oklahoma State Highway Department/ Oklahoma Department of Transportation
1938, 1954, 1961, 1966, 1973, 1980, 1981, 1990, 2003, 2005, 2006, 2008, 2010, 2013, 2015, 2017, 2019, 2021	Aerial photographs	U.S. Department of Agriculture
2012, 2014, 2019, 2022	Aerial photographs	Google Earth

Cemeteries

The information reviewed for the presence of cemeteries is derived from historic USGS quadrangles available for the purpose of the desktop review. There are no cemeteries within one mile of the project area.

Standing Buildings and Structures

The DOE-listed Ponca City Airport Terminal is within the project area. There are no other standing buildings or structures within or immediately adjacent to the project area.

Bridges and Culverts

There are no bridges or within or immediately adjacent to the project area (Oklahoma Department of Transportation [ODOT] 2024).

Defunct/nonextant Buildings, Structures, and Other Cultural Features

There are no defunct or nonextant buildings, structures, or other cultural features within the project area.

Allotment Information

The portion of the Cherokee Outlet containing the project was opened to settlement via land run in 1893 and was not allotted (Clough 2006b:128-129).

Potential Historic-period Resources

Based on the reviewed documents, there are no PHRs within or immediately adjacent to the project area. The existing airport terminal has already been documented on an HPRI form and determined eligible to the NRHP.

Cultural Resource Potential Based on Prior Research

Based on the material examined for this desktop review, the probability of identifying prehistoric resources is moderate across the project area. Although no sites are nearby, the settings crossed by the pipeline are similar to those favored by past people. Based on county soil data, buried surfaces are unlikely.

The potential for historic period resources is low. No PHRs are expected based on background research. Given the slow rate of change over time in historic maps and aerial imagery, it is unlikely that additional historic resources with features would be encountered.

RESEARCH DESIGN AND FIELD METHODS

Research Design

The purpose of the survey was to locate cultural resources within the APE, evaluate the NRHP eligibility of located cultural resources, and assess the effect the proposed improvements would have on the resources. Therefore, the research design and field methods were produced by evaluating the environmental and cultural settings with archival records to identify the types of resources which may be present and where they may be found.

Field Methods

The fieldwork consists of two components, an inventory of the built environment (if necessary) and an archaeological survey. A Garmin *GPSmap 62s* handheld GPS unit set to NAD 1983 is used to record all shovel test locations, photographs, and points of interest. All photographs were taken using a 12 megapixel or greater digital camera. The field observations and documentation for all resources recorded during the survey (if applicable) are presented in the Results section. Any deviations to the field methods will be addressed in the Results section of this report.

The purpose of the built environment inventory is to document standing structures (i.e., houses, barns, farmsteads/homesteads, and bridges) within the project area. Prior to the start of fieldwork, modern maps and aerial photographs were compared to the historic ones to identify the potential locations of built resources. Where applicable, each resource is documented in the field through photographs, the recording of architectural information, deed research completed at the Kay County Clerk's and Assessor's offices and reporting on a HPRI form for standing structures or an ODOT bridge form for bridges and culverts. The documentation for built environment resources would also be reviewed and evaluated by an architectural historian. The Ponca City Airport Terminal was documented on an HPRI in 2023. During fieldwork, we sought additional built resources.

The archaeological component consists of a combination of pedestrian transects and shovel testing to identify surface and buried cultural resources. The pedestrian portion consists of transects spaced at no more than 49.2 feet (15 m) apart. Transect spacing is narrowed as needed for areas of thick vegetation and at resource locations. Cut banks, eroded slopes, tree tip-ups, and rodent back dirt piles are given careful attention.

Shovel tests are excavated in 98.4-foot (30 m) intervals. Additional tests are dug as needed in areas which exhibited the potential for encountering buried cultural resources based on the above expectations, but also in areas where cultural resources were not expected in order to test those expectations. Each test is a roughly 11.8-inch (30 cm) diameter hole dug to culturally sterile soil, 39.8 inches (100 cm) below the surface where possible, or to a restrictive element, such as bedrock or clay beds. Highly compacted soils were dislodged using a tamper bar. Fill from each test is hand sifted through 0.25-inch (0.64 cm) hardware cloth before backfilling. Soils that are very heavily compacted, such as those that are very dry or that have a high clay content, are troweled through as necessary. All shovel test descriptions include UTM coordinates and stratigraphic descriptions (depth [cm], color, Munsell value, texture, and inclusions).

Auger testing is used to sample for stratigraphic information which is deeper than an individual can usually dig with a shovel. Auger tests are used to extend the depth of shovel when culturally sterile horizons are greater than 1 m deep. An AMS 3-inch bucket auger was used. The process

for auger use is as follows: 1) a shovel test is dug as deep as possible by hand and documented; 2) the auger is then used to identify the potential for deeply buried surface horizons (A) and sites. Fill from auger tests is screened and documented as described for shovel tests.

If encountered, all sites will be visually inspected for the full extent of the surface expression then shovel tested to identify the full extent of the subsurface expression within the project area. Sites are cultural manifestations with some degree of spatial, temporal, and functional characteristics. Delineating shovel tests are spaced at 32.8-foot (10 m) intervals. All shovel tests are documented as described above with particular attention paid to natural and cultural layers and surface and subsurface integrity. A site is considered delineated with two negative shovel tests in each direction. Photographs are taken for all features, for representative artifacts, and the general site location. All artifacts will be subjected to in-field analysis and none will be collected. Any standing structures associated with a site are documented using an HPRI form. Information on sites is compiled into an OAS Oklahoma Archeological Site Survey form.

If encountered, all isolated finds are documented with UTM coordinates, photographs, and a description. Isolated finds are artifacts and features which can be generically placed within a cultural unit (i.e., prehistoric, historic, Archaic, etc.), but lack integrity and context. Pedestrian transects and shovel testing will be used to delineate the surface and subsurface expressions of all isolated finds. Delineating shovel tests are spaced at 32.8-foot (10 m) intervals. All shovel tests are documented as described above. An isolated find is considered delineated with two negative shovel tests in each direction. Photographs are taken for all features, for representative artifacts, and the general location. All artifacts will be subjected to in-field analysis and none will be collected.

If encountered, all localities are documented with UTM coordinates, photographs, and a description. Localities are historic and modern materials (i.e., artifacts and features) which possess limited to no research potential due to lack of meaningful cultural association or context. Pedestrian transects and shovel testing will be used to delineate the surface and subsurface expressions of all localities. Delineating shovel tests are spaced at 32.8-foot (10 m) intervals. All shovel tests are documented as described above. A locality is considered delineated with two negative shovel tests in each direction. Photographs are taken for all features, for representative artifacts, and the general location. All artifacts will be subjected to in-field analysis and none will be collected.

FIELDWORK RESULTS

The fieldwork occurred August 27, 2024, and was supervised by Ross Campbell, MA, with the assistance of Nathan Moelling, MA, and Shawn Thomas, BA. Field conditions were partly mild, mild, breezy, and dry. The project area was easily accessible and there were no other impediments to the survey.

Field Observations

The project area is on level terrain to the west of the Ponca City Airport Terminal and adjacent parking lot (Figures 13 – 17). Utility corridors, fence lines, and drainage ditches are associated with the terminal facility along the margins of the undeveloped portion of the project area. The vegetation of the project area consists of manicured grasses with a couple of trees. There was no surface visibility for most of the project area due to thick grass. On the east side of the project area is a small strip of land with trees. Under the trees, there are bare patches with no grass, allowing 100 precent visibility. No knappable material was observed across the surface. No artifacts or features were observed at the surface.

Figure 13. Overview of the project area, facing southeast.

Figure 14. Overview of the project area, facing northeast.

Figure 15. Drainage ditch along the west end of the project area, facing south.

Figure 16. Overview of vegetation and surface visibility near parking lot, facing south.

Figure 17. Ponca City Airport Terminal, facing northeast.

Shovel Test Results

A total of 21 shovel tests were dug across the project area (Figures 18 and 19; Table 6). All shovel tests were dug to well-developed culturally sterile subsoils (Bt). The soils were generally consistent with those anticipated by the soil survey. The soils throughout the project area typically consist of a greyish brown to very dark greyish brown silty loam topsoil (Ap) to an average depth of 5.9 inches (15 cm), terminating in a dark brown to a dark reddish brown well-developed silty clay subsoil (Bt) at a depth of 11.8 inches (30 cm). These soils correspond to the Kirkland series soils.

Road gravel and limestone cobbles were observed in half of the project area. No knappable material was observed in any test. No artifacts or features were observed in any test.

Cultural Resources

No additional cultural resources were documented during this survey. Afendras Archaeology documented the existing terminal on an OKSHPO HPRI form in 2023 and recommended it eligible to the NRHP under Criteria A and C. OKSHPO concurred with our recommendation and subsequently listed it on the Oklahoma DOE. Currently, the FAA is coordinating with OKSHPO and other interested consulting parties to mitigate the effects of the proposed development to the Ponca City Airport Terminal building. No additional cultural resources were identified or documented within the APE during the 2023 survey. The HPRI form prepared for the existing terminal building is included as Appendix I.

Figure 18. Project and resource results, topographic map (Ponca City, Okla. 1968 ([Photorevised 1979])

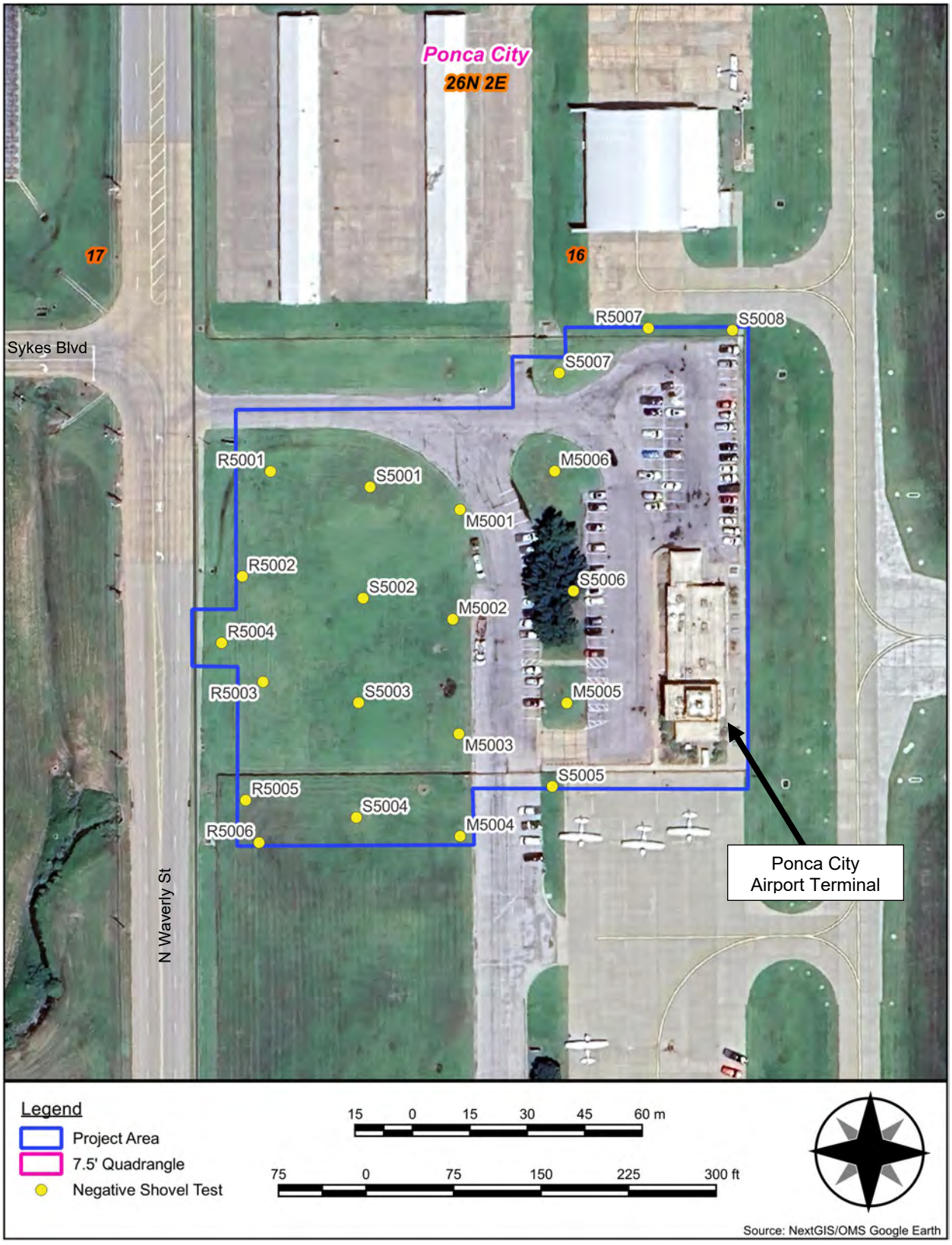

Figure 19. Project and resource results, 2023 aerial photograph.

Table 6. Shovel test data.

#	UTM E	UTM N	Description (depth in cm)	Results
M5001	669456	4066547	0-21: dark brown (10YR3/3), silty clay loam, moderate to heavy compaction 21-32: very dark gray brown (10YR3/2), silty clay, moderate compaction	-
M5002	669455	4066519	0-27: dark brown (10YR3/3), silty loam, moderate to heavy compaction 27-44: dark gray brown (10yr 4/2), silty clay loam, moderate compaction	-
M5003	669457	4066489	0-27: dark brown (10YR3/3), silty loam, moderate to heavy compaction 27-42: dark gray brown (10YR4/2), silty clay loam, moderate compaction	-
M5004	669458	4066462	0-21: dark gray brown (10YR4/2), silty loam, moderate heavy compaction 21-36: very dark gray brown (10YR3/2), silty clay, moderate-heavy compaction	-
M5005	669485	4066497	0-21: dark gray brown (10YR4/2), silty loam, moderate heavy compaction 21-41: dark brown (10YR3/2), silty clay loam, moderate-heavy compaction, few gravels	-
M5006	669481	4066558	0-22: dark gray brown (10YR3/2), and brown (10yr 5/3), clay loam, moderate to heavy compaction 22-36: dark gray brown (10YR3/2), moderate compaction, silty loam 36-56: dark gray brown (10YR3/2), moderate compaction, silty clay loam	-
R5001	669407	4066556	0-8: brown(10yr 4/3), sandy loam, light compaction 8-25+: very dark gray (10YR3/1), clay, high compaction	-
R5002	669400	4066529	0-10: very dark gray/brown(10YR3/2), low compaction 10-30+: very dark brown (10YR2/2), clay, high compaction	-
R5003	669406	4066501	0-5: very dark gray brown (10YR3/2), sandy clay loam, low compaction 5-25+: black (10YR2/1), sandy clay, high compaction blacky ped structure, about 10%	-
R5004	669395	4066511	0-6: very dark grayish brown (10YR3/2), loam, low compaction 6-27+: very dark brown (10YR3/2), sandy clay, high compaction	-
R5005	669402	4066470	0-10: very dark grayish brown (10YR3/2), sandy loam 10-30+: dark reddish brown (5YR3/4), sandy clay, moderate compaction	-
R5006	669405	4066459	0-10: very dark gray brown (10YR3/2), sandy loam, low compaction 10-30+: dark reddish brown (5YR3/4), sandy clay, moderate compaction	-
R5007	669505	4066595	0-10: very dark brown (10YR3/2), loam, low compaction 10-20: concrete/giant lens* 20-40+: dark brown (10YR3/2), silty clay loam, low compaction *St is at NE corner of project area between concrete hangar, N-runway, and terminal parking lot. Concrete lens likely related to past construction.	-
S5001	669433	4066553	0-12: dark gray brown (10YR4/2) silty clay loam, moderate compaction 12-28+ very dark gray brown, (10YR3/2), silty clay, heavy compaction, 0-5 cm-small chunk of limestone	-
S5002	669431	4066524	0-14: dark gray brown (10YR4/2), silty clay loam, moderate compaction 14-32+: dark gray brown (10YR4/2), silty clay loam, moderate compaction	-
S5003	669431	4066496	0-18: gray brown (10YR5/2), silty loam, moderate compaction 14-36+: very dark gray brown, (10YR 3/2), silty clay loam, heavy compaction, 14 cm-small piece of limestone	-
S5004	669431	4066466	0-15: gray brown (10YR5/2), silty loam, moderate compaction 15-37+: very dark gray brown (10YR3/2), silty clay loam, heavy compaction	-
S5005	669482	4066475	0-16: gray brown (10YR5/2), silty loam, moderate compaction 16-21: gray (10YR5/1), silty loam, moderate compaction, over gravel layer? 21-32+: very dark gray brown, (10YR3/2), silty clay, very heavy compaction	-
S5006	669486	4066526	0-12: very dark gray brown (10YR3/2), silty loam, moderate compaction 12-24+: dark brown (10YR3/3), silty clay, very heavy compaction, limestone present, roots throughout	-
S5007	669482	4066583	0-9: gray brown (10YR5/2), silty loam, moderate compaction 9-20+: very dark gray brown (10YR3/2), silty clay, very heavy compaction, gravel and limestone-20%	-
S5008	669527	4066595	0-11: dark gray brown (10YR4/2), silty loam, light to moderate compaction 11-26+: very dark gray brown(10YR3/2), silty clay, very heavy compaction, gravel and limestone less than 30%	-

RECOMMENDATIONS

On August 27, 2024, Afendras Archaeology completed a Phase I cultural resources survey for Blackshare Environmental Solutions, LLC of the Ponca City Airport Terminal Replacement project, Section 16, T26N R2E (~3.84 acres), southeastern Kay County, Oklahoma. Ponca City Regional Airport is proposing to replace the existing 1950s terminal building with a new one. The purpose of the survey was to locate cultural resources within the APE, evaluate the NRHP eligibility of located cultural resources, and assess the effect the proposed improvements would have on the resources.

Afendras Archaeology documented the existing terminal on an OKSHPO HPRI form in 2023 and recommended it eligible to the NRHP under Criteria A and C. OKSHPO concurred with our recommendation and subsequently listed it on the Oklahoma DOE. Currently, the FAA is coordinating with OKSHPO and other interested consulting parties to mitigate the effects of the proposed development to the Ponca City Airport Terminal building.

No additional cultural resources were documented during the survey.

Afendras Archaeology recommends that the Ponca City Airport Terminal Project will have an adverse effect on the existing terminal building, though no effects to archaeological resources. The work described in this report represents a good faith effort to identify cultural resources. However, if additional cultural features (e.g., foundations, water wells, trash pits, etc.) and/or artifacts (e.g., pottery, stone tools and flakes, animal bones, etc.) not discussed within this report are encountered during development, we advise construction personnel to cease construction then consult with the Oklahoma Archeological Survey at 405-325-7211 or oascap@ou.edu to address post-review concerns. If marked or unmarked graves, human skeletal remains, or skeletal remains believed to be human are encountered during development, all potential disturbance to the graves, skeletal remains, or associated items (e.g., artifacts, headstones, etc.) must cease and county law enforcement be notified per Oklahoma Statute § 21-1168.4.

Please note our recommendations are subject to FAA review and approval.

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U.S. Department of Transportation
Federal Aviation Administration

Arkansas/Oklahoma Airports District Office
Southwest Region

FAA ASW-630
10101 Hillwood Parkway
Fort Worth, Texas 76177

January 25, 2024

Oklahoma Historical Society
State Historic Preservation Office
800 Nazih Zuhdi Drive
Oklahoma City, OK 73015

Lynda Ozan
Oklahoma State Historic Preservation Officer

Subject: **FAA Proposed New Terminal Project at Ponca City Regional Airport, 2213 Waverly Street, Ponca City, Kay County, Oklahoma**

Dear Lynda Ozan,

The Federal Aviation Administration (FAA) has received a proposal from Ponca City Regional Airport (PNC) for construction of a new terminal building and removal of the airport's current terminal building. The project would be partially funded with FAA grant funds. The issuance of grant funds is a federal undertaking subject to compliance with National Historic Preservation Act (NHPA) of 1966, as amended (54 U.S.C. § 300101 et seq.) and its implementing regulations,
36 CFR § 800. we invite you to participate in the Section 106 process as a consulting party.

In compliance with the terms set forth in the NHPA, FAA coordinated with the Oklahoma State Historical Preservation Office, which serves as the State Historic Preservation Office (SHPO). The SHPO and FAA recommend that the existing terminal building, constructed in 1953, is eligible for the National Register of Historic Places (NRHP) under Criterion A (Economics) and Criterion C (Architecture) at the local level of significance for its association with the post-World War II economic development of Ponca City.

The objective of the proposed project is to remove the existing terminal building and design and construct a new terminal building, west of the existing terminal. The new terminal building is intended to meet existing and future needs at PNC as well has increasing passenger/crew capacity. The project, as proposed, will include the removal of the existing terminal. FAA determined that the project will therefore adversely affect the existing PNC terminal. Under the terms of Section 106 of the NHPA, FAA, in coordination with the SHPO and additional consulting parties, will develop a plan to mitigate the adverse effects on the current PNC terminal building.

The purpose of this correspondence is to notify your organization of the proposed project, seek comments, and invite you to participate the Section 106 process as a consulting party. To assist in this assessment, we are enclosing a completed maps and project exhibits.

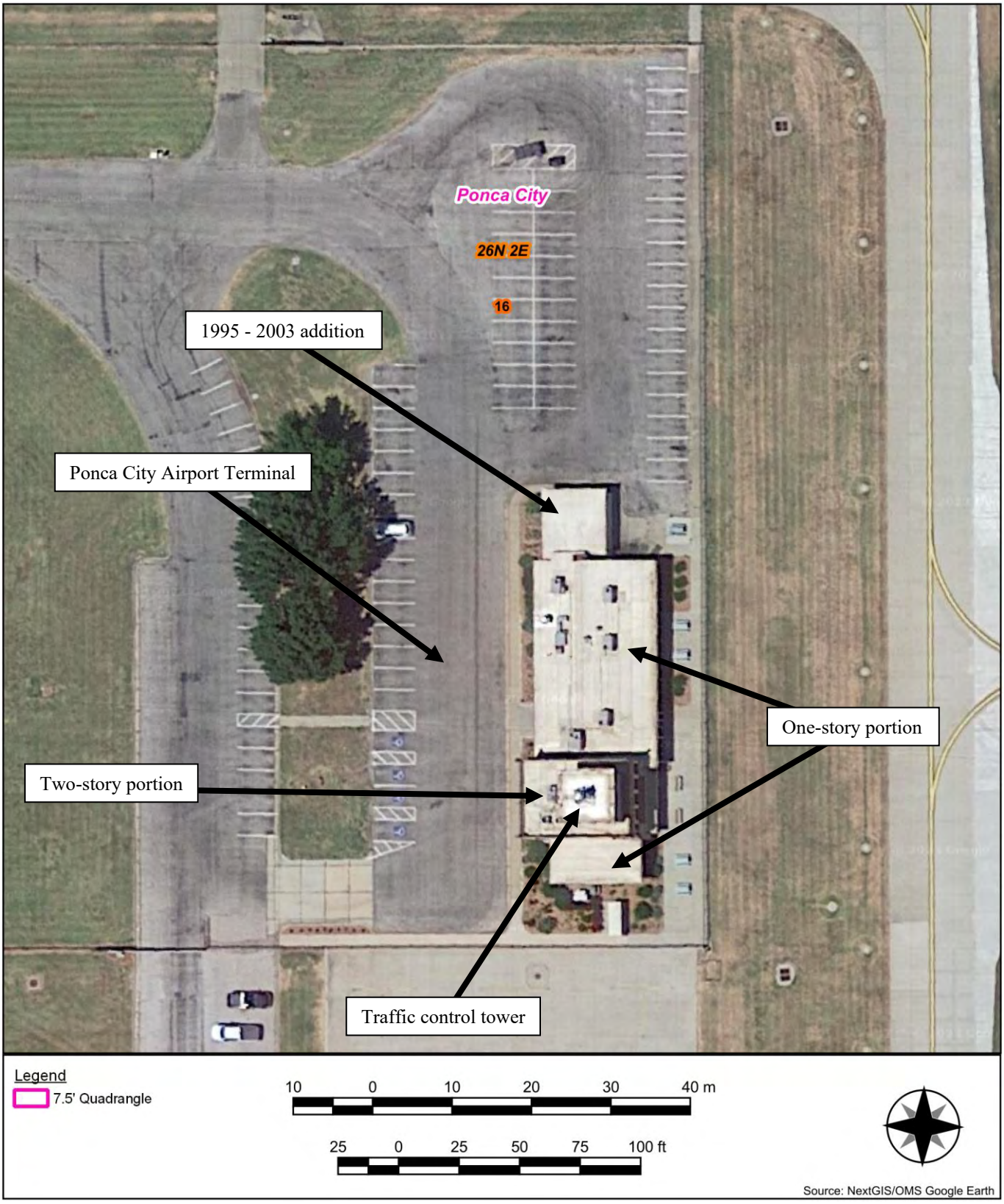


Figure 2. Close-up of property on 2022 aerial photograph.

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal and parking lot, facing southeast
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 1 of 10

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal and parking lot, facing southwest
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 2 of 10

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal, facing south

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 3 of 10

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal and parking lot, facing east

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 4 of 10

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal and parking lot, facing northeast
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 5 of 10

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal, facing northeast
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 6 of 10

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal from taxiway, facing west
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 7 of 10

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal, facing southwest
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 1 of 10

Ponca City Airport Terminal - Attachment

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal addition, facing east

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 9 of 10

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal, facing west

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 10 of 10

ATTACHMENT 4

ADVISORY COUNCIL OF HISTORIC PRESERVATION NOTIFICATION

Advisory Council on Historic Preservation
Electronic Section 106 Documentation Submittal System (e106) Form
MS Word format

Send to: *e106@achp.gov*

Please review the instructions at www.achp.gov/e106-email-form prior to completing this form. Questions about whether to use the e106 form should be directed to the assigned ACHP staff member in the Office of Federal Agency Programs.

I. Basic information

1. **Purpose of notification.** Indicate whether this documentation is to:
   - ☒ Notify the ACHP of a finding that an undertaking may adversely affect historic properties
   - ☐ Invite the ACHP to participate in a Section 106 consultation
   - ☐ Propose to develop a project Programmatic Agreement (project PA) for complex or multiple undertakings in accordance with 36 C.F.R. 800.14(b)(3)
   - ☐ Supply additional documentation for a case already entered into the ACHP record system
   - ☐ File an executed MOA or PA with the ACHP in accordance with 800.6(b)(iv) (where the ACHP did not participate in consultation)
   - ☐ Other, please describe
     Click here to enter text.

2. ACHP Project Number (If the ACHP was previously notified of the undertaking and an ACHP Project Number has been provided, enter project number here and skip to Item 7 below): N/A

3. **Name of federal agency** (If multiple agencies, list them all and indicate whether one is the lead agency):

   Federal Aviation Administration (FAA)

4. **Name of undertaking/project** (Include project/permit/application number if applicable):

   Ponca City Regional Airport (PNC) New Terminal Construction
   Oklahoma Historical Society (OHS) File #1277-23

5. **Location of undertaking** (Indicate city(s), county(s), state(s), land ownership, and whether it would occur on or affect historic properties located on tribal lands):

   2231 Waverly Street, Kay County, Ponca City, Oklahoma. Section 16, Township 26N, Range 2E. Land owned by the City of Ponca City.

6. **Name and title of federal agency official and contact person for this undertaking**, including email address and phone number:

Kelly Oliver-Amy, Environmental Protection Specialist, FAA
Kelly.M.Oliver-Amy@faa.gov
817-222-5645

II. Information on the Undertaking*

7. Describe the undertaking and nature of federal involvement (if multiple federal agencies are involved, specify involvement of each):

The FAA has received a proposal from Ponca City Regional Airport (PNC) for construction of a new terminal building and removal of the airport's current terminal building. The project would be partially funded with FAA grant funds. The issuance of grant funds is a Federal undertaking subject to compliance with Section 106 of the National Historic Preservation Act (NHPA).

The objective of the proposed project is to remove the existing terminal building and design and construct a new terminal building, west of the existing terminal. The current Ponca City Airport Terminal building was constructed in 1953. The new terminal building is intended to meet existing and future needs at PNC as well as increasing passenger/crew capacity.

8. Describe the Area of Potential Effects (APE):

The APE is considered the construction footprint and 100-feet around the current terminal building.

9. Describe steps taken to identify historic properties:

On March 29, 2023, FAA initiated coordination with the SHPO (Oklahoma Historical Society or OHS) seeking review of the project under Section 106 of the NHPA. The documentation was prepared by Secretary of the Interior qualified Cultural Resource Management professionals and presented to the SHPO stated that Ponca City Terminal building was constructed in 1953 and was recommended as eligible for listing in the National Register of Historic Places (NRHP) under Criterion A (Economics) and C (Architecture). Documentation included presenting the project APE of the proposed project area, which includes the Ponca City Airport Terminal building, and photographs showing the terminal building and the viewshed around the building. In addition, copies of historical and current aerial imagery, and Sanborn Fire Insurance Maps were included in the coordination with the SHPO (copies of this information supplied to the SHPO is included in the associated attachment).

For archeology, the Oklahoma Archeological Survey was contacted, and responded on May 1, 2023, indicating that no archeological sites are listed as occurring within the project area, and based on the topographic and hydrologic setting, no archaeological materials are likely to be encountered. Thus, an archaeological field inspection is not considered necessary and recommended that no further work was needed.

On Apil 25, 2023, the SHPO concurred with FAA's determination that the Ponca City Airport Terminal building was eligible for listing in the NRHP under Criteria A and C, and that the proposed project would have an adverse effect on the Ponca City Airport Terminal building. SHPO encouraged efforts to mitigate, minimize or eliminate the adverse effects. If adverse effects cannot be eliminated, then the SHPO requested notification by the FAA of their intent to negotiate the appropriate mitigation measures and enter into a Memorandum of Agreement (MOA), and that the FAA contact the ACHP. The SHPO commented on archaeology stating that no identified historic properties, archeological sites, or other cultural resources are present or affected. However, if cultural materials are encountered during project activities, work should cease in the immediate area; work can continue where no cultural materials are

present.

10. Describe the historic property (or properties) and any National Historic Landmarks within the APE (or attach documentation or provide specific link to this information):

Ponca City Airport Terminal is eligible for the National Register of Historic Places under Criterion A (Economics) and Criterion C (Architecture) at the local level of significance for its association with the post-World War II economic development of Ponca City. The period of significance is 1953, which corresponds to the building's construction.

The building was designed by William R. Brown, A.I.A. and constructed by the City of Ponca City, the Civil Aeronautics Administration and Robertson Construction Company. The terminal includes a popular Mexican restaurant, and the traffic control tower is atop of the two-story portion of the building. The original portion of the terminal has brick-clad walls. All windows are metal and fixed. The southern elevation of the lower and upper story has corner windows with metal supports. All but two of the glass security doors on the two-story portion of the north elevation are metal with full glass. The two security doors on the north elevation area metal with three windows. This area has a flat metal covering above the doors. The northeast elevation is a dining area for the restaurant, enclosed entirely by floor-to-ceiling glass windows and doors. The roof of the one-story portion is flat and composed of concrete, overhanging the walls by a few feet. The two-story portion with the control tower is also flat but has a low wall and metal railing around the edge. The level with the control tower is accessible from the one-story roof by an exterior metal ladder. The control tower consists of vertical walls above which are metal fixed windows on all facades. The lower wall is covered with protective sheeting. The west side of the control tower had a single metal door with a small window. The only decorative elements on the terminal are the metal words "Ponca City" mounted on the two-story portion of the east and west elevations, above the windows. The addition on the north side of the terminal has a concrete foundation with metal walls and a flat metal roof. A single metal slab door is on the east elevation and a single metal sliding window is on the north elevation.

11. Describe the undertaking's effects on historic properties:

The Project undertaking will have an adverse impact to the historic properties due to demolition of the resource.

Explain how this undertaking would adversely affect historic properties (include information on any conditions or future actions known to date to avoid, minimize, or mitigate adverse effects):

The removal of the existing 1953 Ponca City Airport Terminal building would adversely affect the building by directly diminishing the historical integrity of design, workmanship, materials, feeling, association and setting.

Mitigation efforts will be discussed with interested consulting parties in a meeting following the consulting party presentation and meeting scheduled for March 26, 2024.

13. Provide copies or summaries of the views provided to date by any consulting parties, Indian tribes or Native Hawai'ian organizations, or the public, including any correspondence from the SHPO and/or THPO.

No views were provided by tribal organizations or Native Hawaiian organizations for the project.

Views and responses from consulting parties will be collected and considered during the March 26, 2024

presentation and virtual meeting.

III. Additional Information

14. **Please indicate the status of any consultation that has occurred to date, including whether there are any unresolved concerns or issues the ACHP should know about in deciding whether to participate in consultation.** Providing a list of consulting parties, including email addresses and phone numbers if known, can facilitate the ACHP's review response.

Between January 26-January 29, 2023, letters sent via email or U.S. Postal Service/Certified Mail (when email addresses were not available) to the consulting parties and tribal organizations listed below. All letters were documented as having been received by all parties between January 29, 2024. As of today's date, responses have been received from three of the seven consulting parties. Below are two tables: Table 1 summarizes the tribal organizations contacted (some with two contact emails; thus, the duplication in organizations listed). Table 2 summarizes the consulting parties contacted, and responses received. All parties were contacted via email unless otherwise noted for the purpose of record-keeping.

On March 26, 2024, a presentation and meeting with the consulting parties who have expressed interest in the process will be held to discuss the project and to present potential mitigation measures for the terminal building. The parties invited include the Deputy SHPO and the OHS Section 106 Coordinator, the City of Ponca City representatives, a representative from FAA, a representative from the Ponca City Airport. In addition, environmental consultants involved with the project will be present.

Table 1: Tribal Organizations Invited to Consult

Organization	Phone	Email	Response
Apache Tribe of Oklahoma	(405) 247-9493	durell.cooper@apachetribe.org	Delivered: 1/29/2024 *No response*
Apache Tribe of Oklahoma	(405) 247-9493	bkomardley@outlook.com	Delivered: 1/29/2024 *No response*
Cherokee Nation Cheyenne and Arapaho Tribes, Oklahoma	(918) 453-5389	elizabeth-toombs@cherokee.org	Delivered: 1/29/2024 *No response*
Cheyenne and Arapaho Tribes, Oklahoma	405-422-7714	mbear@cheyenneandarapaho-nsn.gov	Delivered: 1/29/2024 *No response*
Kaw Nation, Oklahoma	(800) 247-4612	rwassana@c-a-tribes.org	Delivered: 1/29/2024 *No response*
Osage Nation	(580) 269-2552	kjenkins@kawnation.com	Delivered: 1/29/2024 *No response*
Tonkawa Tribe of Indians of Oklahoma	(918) 287-5328	s106@osagenation-nsn.gov	Delivered: 1/29/2024 *No response*
Tonkawa Tribe of Indians	(580) 628-2561	rmartin@tonkawatribe.com	Delivered:

of Oklahoma			1/29/2024 *No response*
Wichita and Affiliated Tribes (Wichita, Keechi, Waco & Tawakonie), Oklahoma	(580) 628-7027	lbrown@tonkawatribe.com	Delivered: 1/29/2024 *No response*
Wichita and Affiliated Tribes (Wichita, Keechi, Waco & Tawakonie), Oklahoma	(405) 247-8695 ext. 200	gary.mcadams@wichitatribe.com	Delivered: 1/29/2024 *No response*

Table 2: Consulting Parties Invited to Consult

Organization	Phone	Email/Address	Response
OK Archeological Survey (OAS) Dr. Kary Stackelbeck	405-325-7211	oascap@ou.edu	Delivered: 1/30/2024; Response: 2/2/2024 *No archeological concerns: deferred consultation to OHS*
SHPO/OHS Deputy SHPO: Lynda Ozan	405-522-4484	Lynda.ozan@history.ok.gov	Delivered: 1/29/2024 Response: 2/7/2024 *Will continue to consult with FAA on the project*
Anthony Maeve, AIA Eastern Oklahoma Chapter	918-583-5300	Beck Design 110 West 7th Street, Ste 710, Tulsa, OK 74119	Delivered via US Postal Service, Certified Mail 1/29/2024; received 1/31/2024 *No response*
AIA Central OK Chapter	n/a	melissa@aiacoc.org	Delivered: 1/29/2024 *No response*
Don Nuzum Ponca City Regional Airport	580-767-0470	airport@poncacityok.gov	Delivered 1/29/2024 *Participating in consultation*
Ponca Historic Preservation	580-767-0339	grants@poncacity.ok.org	Delivered 1/29/2024 *No response*
Preservation Oklahoma	n/a	Tori.l.raines@gmail.com	Delivered 1/29/2024 *No response*

15 Does your agency have a website or website link where the interested public can find out about this project and/or provide comments? Please provide relevant links:

No website or website link is available.

16. Is this undertaking considered a "major" or "covered" project listed on the Federal Infrastructure Projects Permitting Dashboard? If so, please provide the link:

The Ponca City Terminal building replacement project is not a major undertaking, however, the Environmental Assessment will be listed on the Permitting Dashboard for Federal Infrastructure Projects because of a 2016 Secretary of Transportation memorandum stating that all Department of Transportation (DOT) Operating Administrations shall use the Dashboard to track projects covered by Environmental Assessments and Environmental Impact Statements.

The following are attached to this form (check all that apply):

- ☒ Section 106 consultation correspondence
- ☒ Maps, photographs, drawings, and/or plans
- ☐ Additional historic property information
- ☐ Consulting party list with known contact information
- ☐ Other: Click here to enter text.

U.S. Department of Transportation
Federal Aviation Administration

Arkansas/Oklahoma Airports District Office
Southwest Region

FAA ASW-630
10101 Hillwood Parkway
Fort Worth, Texas 76177

March 29, 2023

Oklahoma Historical Society
State Historic Preservation Office
Attn: Lynda S. Ozan, Deputy State Historic Preservation Officer
800 Nazih Zuhdi Drive
Oklahoma City, OK 73105-7917

Subject: Ponca City Regional Airport (PNC) New Terminal Construction
Kay County, Section 16, Township 26N, Range 2E

Dear Ms. Ozan:

The Federal Aviation Administration (FAA) has received a proposal from Ponca City Regional Airport (PNC) for construction of a new terminal building and removal of the airport's current terminal building. The project would be partially funded with FAA grant funds. The issuance of grant funds is a Federal undertaking subject to compliance with Section 106 of the National Historic Preservation Act (NHPA). We are seeking your review of the project under Section 106 of the NHPA.

The objective of the proposed project is to remove the existing terminal building and design and construct a new terminal building, west of the existing terminal. The terminal was constructed in 1953. The new terminal building is intended to meet existing and future needs at PNC as well has increasing passenger/crew capacity.

To assist in this assessment, we are enclosing a completed Historic Preservation Resource Identification Form along with project exhibits.

Project Location: 2231 Waverly Street in Ponca City, Kay County, OK
Legal Description: Section 16, Township 26 North, Range 2 East

A request for review has also been sent to the Oklahoma Archaeological Survey. If you have any questions or require additional information, please feel free to contact me at: Kelly.M.Oliver-Amy@faa.gov or 817-222-5645.

Sincerely,

Kelly Oliver-Amy
Environmental Protection Specialist
Arkansas/Oklahoma Airports District Office

Attachments

HISTORIC PRESERVATION RESOURCE IDENTIFICATION FORM

PLEASE TYPE ALL DATA IN UPPERCASE - FIELDS IN RED ARE REQUIRED

1. PROPERTY NAME: PONCA CITY AIRPORT TERMINAL (FAA REPLACEMENT PROJECT)

2. RESOURCE NAME: PONCA CITY AIRPORT TERMINAL

3. ADDRESS: 2213 N WAVERLY ST, PONCA CITY, OK 74601

4. CITY: PONCA CITY 5. VICINITY:

6. COUNTY NAME: KAY

7. LOT: 8. BLOCK: 9. PLAT NAME:

10. SECTION: 16 11. TOWNSHIP: 26N 12. RANGE: 2E

13. LATITUDE (NORTH): (ENTER AS: "dd.ddddd") 36.729210

14. LONGITUDE (WEST): (ENTER AS: "-dd.ddddd") -97.101619

15. UTM ZONE: 14 16. NORTHINGS: 4066513 17. EASTINGS: 669516

18. RESOURCE TYPE: BUILDING

19. HISTORIC FUNCTION: AIR-RELATED

20. CURRENT FUNCTION: AIR-RELATED

21. AREA OF SIGNIFICANCE, PRIMARY: COMMERCE

22. AREA OF SIGNIFICANCE, SECONDARY: ARCHITECTURE

23. DESCRIPTION OF SIGNIFICANCE:

THE TERMINAL IS RECOMMENDED NRHP ELIGIBLE UNDER CRITERION A FOR ASSOCIATION WITH ECONOMIC GROWTH OF (SEE CONTINUATION)

24. DOCUMENTATION RESOURCE:

1872 T26N R2E GENERAL LAND OFFICE SURVEY PLAT; 1910 KAY COUNTY PLAT ATLAS; 1915 KAY COUNTY SOIL MAP (SEE CONTINUATION)

25. NAME OF PREPARER: DEAN AFENDRAS AND KATHRYN STCLAIR

59. SURVEY PROJECT NO 26. PROJECT NAME: FAA REPLACEMENT PROJECT

27. DATE OF PREPARATION: 3/15/2023 28. PHOTOGRAPHS YES

29. YEAR: 2023

30. ARCHITECT/BUILDER: (SEE CONTINUATION)

31. YEAR BUILT: 1953

32. ORIGINAL SITE: YES

33. DATE MOVED: N/A

34. FROM WHERE: N/A

35. ACCESSIBLE: YES

36. ARCHITECTURAL STYLE: MODERN MOVEMENT

37. OTHER ARCHITECTURAL STYLE: N/A

38. FOUNDATION MATERIAL: CONCRETE

39. ROOF TYPE: FLAT

40. ROOF MATERIAL: CONCRETE

41. WALL MATERIAL, PRIMARY: BRICK

42. WALL MATERIAL, SECONDARY: METAL

43. WINDOW TYPE: FIXED

44. WINDOW MATERIAL: METAL

45. DOOR TYPE: GLAZED

46. DOOR MATERIAL: METAL

47. EXTERIOR FEATURES: (SEE DESCRIPTION)

48. INTERIOR FEATURES: (SEE DESCRIPTION)

49. DECORATIVE DETAILS: METAL WORDS "PONCA CITY" ON E AND W ELEVATIONS

50. CONDITION OF RESOURCE: EXCELLENT (PERFECTLY MAINTAINED)

51. DESCRIPTION OF RESOURCE:

THE PONCA CITY AIRPORT TERMINAL IS A TWO-STORY BUILDING CONSTRUCTED IN 1953. THE DATE OF CONSTRUCTION IS ON A (SEE CONTINUATION)

52. COMMENTS:

UTM NAD 83

53. ATTACH LOCATION MAP

54. LISTED ON NATIONAL REGISTER: NO

55. NATIONAL REGISTER ENTRY: N/A

56. CONTINUATION

23. DESCRIPTION OF SIGNIFICANCE:
PONCA CITY RELATED TO THE OIL AND GAS INDUSTRY, AND UNDER CRITERION C FOR MODERN MOVEMENT STYLE.

CONTINUATION SHEET, IF APPLICABLE

THE EARLY ECONOMY OF KAY COUNTY WAS DRIVEN BY AGRICULTURE, BUT THE OIL AND GAS INDUSTRY BOOMED IN THE EARLY TWENTIETH CENTURY, PROPELLING THE COUNTY INTO PERIODS OF ECONOMIC GROWTH THROUGHOUT THE CENTURY.

THE IMPORTANT OIL TOWN OF PONCA CITY WAS HEAVILY INFLUENCED BY THE OIL BOOM AND BUST CYCLE IN OSAGE COUNTRY AND THEIR RESPECTIVE COUNTIES. FOR EXAMPLE, PONCA CITY WAS ESTABLISHED IN 1893 AS A CATTLE RANCHING COMMUNITY. HOWEVER, FOLLOWING THE DISCOVERY OF OIL NEAR NEWKIRK IN 1894, THE ECONOMIES OF THE REGION WERE INEXTRICABLY TIED TO THE OIL AND GAS INDUSTRY. THE DISCOVERY OF OIL AT THE BURBANK OIL FIELD IN 1920 FURTHER SOLIDIFIED THE CONNECTION. CENSUS DATA FOR PONCA CITY FOR 1900-1980 BEARS WITNESS TO THIS (PONCA CITY HISTORIC PRESERVATION ADVISORY PANEL N.D.:12; WILSON 2009). TWO PERIODS OF POPULATION SPIKES ARE RECORDED IN THE CENSUS DATA, ONE SPIKE IN THE 1920S AND 1930S (179.7 AND 128.8 PERCENT INCREASES RESPECTIVELY) AND THE OTHER IN THE 1950S AND 1960S (20.2 AND 21.1 PERCENT INCREASES RESPECTIVELY). THE FIRST PERIOD BEGINS WITH THE OIL BOOM WHICH BEGAN IN THE TEENS AND ITS DECLINE COINCIDES WITH THE BUST ASSOCIATED WITH THE ONSET OF THE GREAT DEPRESSION. THE SECOND PERIOD COINCIDES WITH INCREASING ACTIVITY AT THE CONOCO-PHILIPS FACILITY IN PONCA CITY. THE ENERGY INDUSTRY, ALONG WITH RANCHING, CONTINUES TO BE THE ECONOMIC FOUNDATION OF KAY COUNTY.

THE PONCA CITY AIRPORT TERMINAL WAS CONSTRUCTED IN THE POST-WORLD WAR II PERIOD WHEN THE CITY WAS EXPERIENCING A PERIOD OF RAPID GROWTH FUELED BY THE SUCCESS OF THE OIL AND GAS INDUSTRY. IN ADDITION TO A NEW, MODERN TERMINAL, A DRIVE-IN THEATER (AIRLINE DRIVE-IN), NUMEROUS RESIDENTIAL NEIGHBORHOODS, CIVIC (INCLUDING THE MODERN MOVEMENT-STYLE, NRHP-LISTED STONEGATE ELEMENTARY SCHOOL) AND COMMERCIAL BUILDINGS WERE CONSTRUCTED IN THE COMMUNITY DURING THIS PERIOD. THOUGH THE AIRFIELD AND HANGARS WERE ALREADY ESTABLISHED AT THE AIRPORT BEGINNING IN THE 1930S, THE CITY DID NOT HAVE A TERMINAL BUILDING TO HOST THE INFLUX IN PEOPLE MOVING TO THE AREA AND BUSINESS TRAVELERS. THE TERMINAL WAS CONSTRUCTED AS A RESULT OF THE BOOMING LOCAL ECONOMY AND THE TERMINAL DESIGN PROVIDED AN OPPORTUNITY TO EXPRESS THE TECHNOLOGICAL ADVANCEMENTS AND OPTIMISM OF THE CITY WITH THE MODERN STYLE. THEREFORE, THE TERMINAL BUILDING RETAINS HISTORICAL SIGNIFICANCE UNDER CRITERIA A FOR THE ASSOCIATION WITH THE ECONOMIC AND POPULATION DEVELOPMENT OF PONCA CITY AS A DIRECT RESULT OF THE OIL AND GAS INDUSTRY AND POST-WORLD WAR II GROWTH.

THE PONCA CITY AIRPORT TERMINAL WAS DESIGNED BY WILLIAM R. BROWN, AN ARCHITECT WHO ALSO DESIGNED THE NRHP LISTED PONCA CITY POWER PLANT AND ASSISTED WITH THE DESIGN OF THE NRHP-LISTED FIRST PRESBYTERIAN CHURCH (ALSO DESIGNED IN THE MODERN MOVEMENT STYLE). (SEE CONTINUATION)

23. DESCRIPTION OF SIGNIFICANCE:
WITH FURTHER RESEARCH, THE TERMINAL MAY BE CONSIDERED HISTORICALLY SIGNIFICANT UNDER CRITERION B FOR ASSOCIATION WITH WILLIAM R. BROWN, ON THE LOCAL LEVEL, AS THIS ARCHITECT CURRENTLY HAS TWO NRHP-LISTED BUILDINGS ASSOCIATED WITH HIM AND HIS ARCHITECTURAL DESIGN.

THE PONCA CITY AIRPORT TERMINAL EXHIBITS CHARACTERISTICS OF THE MODERN MOVEMENT STYLE, WHICH IS A BROAD TERM THAT ENCOMPASSES ART DECO, ART MODERNE, STREAMLINE MODERNE AND THE INTERNATIONAL STYLES SPANNING FROM THE 1920S THROUGH THE 1950S. THE TERMINAL, WITH THE CUBIC GEOMETRY, FLAT ROOF, HORIZONTAL BANDING OF BRICK AND WINDOWS, CLEAN LINES AND ART DECO STYLE SIGNAGE DISPLAYS FEATURES OF ART DECO AND INTERNATIONAL STYLES WITHIN THE MODERN MOVEMENT. THOUGH THERE HAVE BEEN SOME ADDITIONS, THE ORIGINAL RECTANGULAR MASSING, LACK OF ORNAMENTATION AND MATERIALS REMAINS INTACT. THE TERMINAL DESIGN RETAINS A SENSE OF FUNCTION AND A STREAMLINED FORM OVER ORNAMENTATION, WHILE THE MODERN DESIGN AND MATERIALS, FORM AND SCALE OF THE BUILDING CONVEYS PONCA CITY'S EXPRESSION OF TECHNOLOGICAL ADVANCEMENT, ECONOMIC GROWTH, AND PARTICIPATION IN THE COUNTRY'S POST WAR INDUSTRIAL ADVANCEMENTS.

THE TERMINAL BUILDING IS LOCATED WITHIN PONCA CITY MUNICIPAL AIRPORT COMPLEX, WHICH WAS ESTABLISHED IN 1930 WITH THE NRHP-LISTED AIRPORT BRICK HANGAR (OLI #101059) AND LATER THE NRHP-LISTED WEST HANGAR (OLI #102090) CONSTRUCTED IN 1942. THE AIRPORT SETTING, INCLUDING THE HANGARS AND AIRFIELD IS INTACT, CONVEYING THE FEELING AND ASSOCIATION OF A MODERN MOVEMENT STYLE ERA AIRPORT COMPLEX. OVERALL, THE TERMINAL RETAINS INTEGRITY OF DESIGN, WORKMANSHIP, MATERIALS, LOCATION, FEELING, SETTING AND ASSOCIATION OF A BUILDING CONSTRUCTED IN RESPONSE TO RAPID GROWTH OF PONCA CITY AS A RESULT OF THE SUCCESSFUL OIL AND GAS INDUSTRY AND IS THEREFORE RECOMMENDED AS ELIGIBLE FOR LISTING IN THE NRHP UNDER CRITERION A AND C WITH THE PERIOD OF SIGNIFICANCE AS 1953 THROUGH THE MID-1970S. THE TERMINAL BUILDINGS AND ASSOCIATED HANGARS MAY BE CONSIDERED A HISTORIC DISTRICT OR COMPLEX WITH MULTIPLE PERIODS OF SIGNIFICANCE AND AREAS OF SIGNIFICANCE.

24. DOCUMENTATION RESOURCE:
1925, 1931, 1931 (REV. 1947) SANBORN FIRE INSURANCE MAPS

1936, 1936 (REV. 1937), 1953 (REV. 1957), 1953 (REV. 1958), 1963 (REV. 1968), 1969 (1972), 1976 (REV. 1977), 1976 (REV. 1983), 1986 (REV. 1988), 1986 (REV. 1988) KAY COUNTY HIGHWAY MAPS

1938, 1954, 1961, 1966, 1973, 1980, 1981, 1990, 2003, 2005, 2006, 2008, 2010, 2013, 2015, 2017, 2019, 2021 USDA AERIAL PHOTOGRPAHS

1968 (PHOTOREVISED 1979) PONCA CITY, OKLA. 7.5' USGS QUADRANGLE

2012, 2014, 2022 GOOGLE EARTH AERIAL PHOTOGRAPHS

DENSON, PAULA CARMACK
2009 PONCA CITY. IN, *THE ENCYCLOPEDIA OF OKLAHOMA HISTORY AND CULTURE*. OKLAHOMA STATE HISTORIC PRESERVATION OFFICE. ELECTRONIC DOCUMENT, HTTPS://WWW.OKHISTORY.ORG/PUBLICATIONS/ENC/ENTRY?ENTRY=PO008, ACCESSED MARCH 14, 2023.

PONCA CITY HISTORIC PRESERVATION ADVISORY PANEL
ND HISTORIC CONTEXT FOR PONCA CITY, MANAGEMENT REGION 2. SUBMITTED TO THE OKLAHOMA STATE HISTORIC PRESERVATION OFFICE, OKLAHOMA CITY. ELECTRONIC DOCUMENT, HTTP://WWW.OKHISTORY.ORG/SHOP/CONTEXTS/REGION2PONCACITY.PDF, ACCESSED JUNE 24, 2014.

WILSON, LINDA D.
2009 KAY COUNTY. IN, *THE ENCYCLOPEDIA OF OKLAHOMA HISTORY AND CULTURE*. OKLAHOMA STATE HISTORIC PRESERVATION OFFICE. ELECTRONIC DOCUMENT, HTTPS://WWW.OKHISTORY.ORG/PUBLICATIONS/ENC/ENTRY.PHP?ENTRY=KA009, ACCESSED JUNE 29, 2022.

30. ARCHITECT/BUILDER:
WILLIAM R. BROWN A.I.A. ARCHITECT/THE CITY OF PONCA CITY, CIVIL AERONAUTICS ADMINISTRATION, ROBERTSON CONSTRUCTION CO.

51. DESCRIPTION OF RESOURCE:
PLAQUE INSIDE THE TERMINAL. THE PLAQUE ALSO SAYS THE TERMINAL WAS DESIGNED BY WILLIAM R. BROWN A.I.A. ARCHITECT AND CONSTRUCTED BY THE CITY OF PONCA CITY, THE CIVIL AERONAUTICS ADMINISTRATION, AND ROBERTSON CONSTRUCTION CO. IN ADDITION TO BEING AN AIRPORT TERMINAL, THE BUILDING ALSO CONTAINS ENRIQUE'S MEXICAN RESTAURANT, AND THE TRAFFIC CONTROL TOWER IS ON TOP OF THE TWO-STORY PORTION OF THE TERMINAL. AN ADDITION WAS BUILT ON THE NORTH SIDE OF THE TERMINAL BETWEEN 1995 AND 2003.

THE ORIGINAL PORTION OF THE TERMINAL HAS BRICK-CLAD WALLS. ALL WINDOWS ARE METAL AND FIXED. THE SOUTHERN ELEVATION OF THE LOWER AND UPPER STORY HAS CORNER WINDOWS WITH METAL SUPPORTS. ALL BUT TWO OF THE SECURITY DOORS ON THE TWO-STORY PORTION OF THE NORTH ELEVATION ARE METAL WITH FULL GLASS. THE TWO SECURITY DOORS ON THE NORTH ELEVATION ARE METAL WITH THREE WINDOWS. THIS AREA HAS A FLAT METAL COVERING ABOVE THE DOORS. THE NORTHEAST ELEVATION IS A DINING AREA FOR ENRIQUE'S, ENCLOSED ENTIRELY BY FLOOR-TO-CEILING GLASS WINDOWS AND DOORS. THE ROOF OF THE ONE-STORY PORTION IS FLAT AND OF CONCRETE, OVERHANGING THE WALLS BY A FEW FEET. THE TWO-STORY PORTION WITH THE CONTROL TOWER IS ALSO FLAT BUT HAS A LOW WALL AND METAL RAILING AROUND THE EDGE. THE LEVEL WITH THE CONTROL TOWER IS ACCESSIBLE FORM THE ONE-STORY ROOF BY AN EXTERIOR METAL LADDER. THE CONTROL TOWER CONSISTS OF VERTICAL WALLS ABOVE WHICH ARE EVERTED METAL FIXED WINDOWS IN ALL CARDINAL DIRECTIONS. THE LOWER WALL WAS COVERED WITH PROTECTIVE SHEETING. THE WEST SIDE OF THE CONTROL TOWER HAD A SINGLE METAL DOOR WITH A SMALL WINDOW. THE ONLY DECORATIVE ELEMENTS ON THE TERMINAL ARE THE METAL WORDS "PONCA CITY" ON THE TWO-STORY PORTION OF THE EAST AND WEST ELEVATIONS, ABOVE THE WINDOWS. THE ILLUMINATED METAL SIGN FOR "ENRIQUE'S MEXICAN RESTAURANT" IS ON THE WEST ELEVATION TO THE LEFT OF THE TERMINAL ENTRANCE. OVERALL, THE EXTERIOR OF THE TERMINAL IS IN GOOD CONDITION AND WELL MAINTAINED.

THE ADDITION ON THE NORTH SIDE OF THE TERMINAL HAS A CONCRETE FOUNDATION WITH METAL WALLS AND A FLAT METAL ROOF. A SINGLE METAL SLAB DOOR IS ON THE EAST ELEVATION AND A SINGLE METAL SLIDING WINDOW IS ON THE NORTH ELEVATION.

ONLY THE PUBLIC AREAS OF THE INTERIOR WERE ACCESSIBLE. THE TERMINAL INTERIOR HAS A MIX OF PAINTED, TILED, AND BRICK-CLAD WALLS WITHIN THE COVERED PORTION OF THE RESTAURANT. THERE IS A DROPPED CEILING. OVERALL, THE EXTERIOR OF THE TERMINAL IS IN GOOD CONDITION AND WELL MAINTAINED.

THE EARLIEST MAP SHOWING AN AIRPORT AT THIS LOCATION IS THE 1931 SANBORN FIRE INSURANCE MAP. THE PREVIOUS SANBORN MAP FOR 1925 DOES NOT SHOW AN AIRPORT. THE ONLY BUILDING SHOWN IN 1931 AT THE AIRPORT IS THE PONCA CITY AIRPORT BRICK HANGAR (OLI #101059)/PONCA CITY MUNICIPAL AIRPORT HANGAR (NR #RS100004173). THE BRICK HANGAR IS ALSO THE ONLY AIRPORT BUILDING VISIBLE ON THE 1938 AERIAL PHOTOGRAPH AND IS STILL STANDING 315 FEET SOUTH OF THE TERMINAL. IN ADDITION TO THE BRICK HANGAR, THE 1947 REVISION OF THE 1931 SANBORN FIRE INSURANCE MAP SHOWS THE SCHOOL OF AERONAUTICS (NOT SHOWN ON ANY MAP OR AERIAL PHOTOGRAPH) APPROXIMATELY 180 FEET TO THE NORTH OF THE HANGAR. ALTHOUGH NOT SHOWN ON THE 1947 SANBORN MAP, BUILDINGS ASSOCIATED WITH THE DARR SCHOOL OF AERONAUTICS (1941 – 1944) ARE VISIBLE ON THE 1954 AERIAL PHOTOGRAPH 2,640 FEET NORTHEAST OF THE TERMINA (DENSON 2009). THE TERMINAL WAS BUILT IN 1953 AND IS CLEARLY VISIBLE ON THE 1954 AERIAL PHOTOGRAPH. PART OF THE CURRENT PARKING LOT IS VISIBLE TO THE WEST AND NORTH AND THE TAXIWAY WAS NEARER TO THE EASTERN SIDE OF THE TERMINAL THAN IT IS NOW. THERE IS A MIX OF GRASSY AND PAVED AREAS TO THE SOUTH BETWEEN THE TERMINAL AND BRICK HANGAR. TWO RUNWAYS ARE VISIBLE IN 1954, ONE MEASURING 4,790 FEET NORTH-SOUTH WHICH IS INTERSECTED BY A SOUTHWEST-NORTHEAST ONE MEASURING 3,490 FEET. THE HANGAR 280 FEET NORTH OF THE TERMINAL WAS BUILT BY 1954 AND THE FIRST OF THE LONG (NORTH-SOUTH) BUILDINGS 275 FEET NORTHWEST OF THE TERMINAL WERE BUILT BY 1961. BETWEEN 1954 AND 1973, ADDITIONAL BUILDINGS WERE CONSTRUCTED BETWEEN THE NORTH-

SOUTH RUNWAY AND WAVERLY ST (THE NEAREST 580 FEET NORTHWEST OF THE TERMINAL). THE 1966 AERIAL PHOTOGRAPH SHOWS THE SOUTHWEST-NORTHEAST ORIENTED RUNWAY HAD RECENTLY BEEN REMOVED WHILE THE REMAINING NORTH-SOUTH RUNWAY WAS EXTENDED 1,800 FEET FURTHER NORTH. SINCE 1973, ADDITIONAL BUILDINGS HAVE BEEN CONSTRUCTED BETWEEN THE NORTH-SOUTH RUNWAY AND WAVERLY ST WHILE MOST OF THE BUILDINGS ASSOCIATED WITH THE DARR SCHOOL OF AERONAUTICS WERE REMOVED OR MODIFIED. THERE WERE ALSO RECONFIGURATIONS TO THE TAXIWAYS AND ADDITIONAL INFRASTRUCTURE ADDED. THE RUNWAY WAS EXTENDED ANOTHER 980 FEET BY 2003. BETWEEN 2008 AND 2010, THE TAXIWAY ON THE EAST SIDE OF THE TERMINAL WAS REMOVED AND A GRASSY AREA ESTABLISHED BETWEEN THE TERMINAL AND TAXIWAY. BY 2010, THE AIRPORT, AS IT IS PRESENTLY, WAS SET.

FIVE PROPERTIES ASSOCIATED WITH THE PONCA CITY AIRPORT ARE LISTED IN THE OLI, TWO OF WHICH ARE CROSS LISTED IN THE NRHP (TABLE 1).

Table 1. OLI and NRHP properties associated with the Ponca City Airport.

OLI Property	NRHP Property	Description
Ponca City Airport Brick Hangar (OLI #101059)	Ponca City Municipal Airport Hangar (NR #RS100004173)	Art Deco hangar built 1930 – 1932. Significant under Criterion A for economics is it "symbolized the strong economic relationship between a burgeoning aviation sector and Oklahoma's oil industry" (2018 NRHP Form). Also significant for military as a part of the WWII British and American pilot training program with the Darr School of Aeronautics 1941 – 1944.
Ponca City Airport Building Foundation (OLI #102087)	N/A	Slab foundation of former WWII building constructed in 1942. Not eligible due to razing.
Ponca City Airport Building Center Hangar (OLI #102088)	N/A	Round-roofed rectangular airplane hangar constructed in 1942. Not eligible due to alterations.
Ponca City Airport Building East Hangar (OLI #102089)	N/A	Round-roofed rectangular airplane hangar constructed in 1942. Not eligible due to alterations.
Ponca City Airport Building West Hangar (OLI #102090)	Darr School of Aeronautics Hangar No. 3 (NR #06000794)	Steel, closed arch truss hangar built in 1942, significant under Criterion A for military and economics, and under Criterion C for architecture for the period of 1942 – 1944. The hangar was originally built for the WWII British and American pilot training program with the Darr School of Aeronautics (1941 – 1944) and was subsequently part of the Ponca City Airport during post-WWII economic growth of the city. It is also an example of WWII-era-era prefabricated airplane hangars.

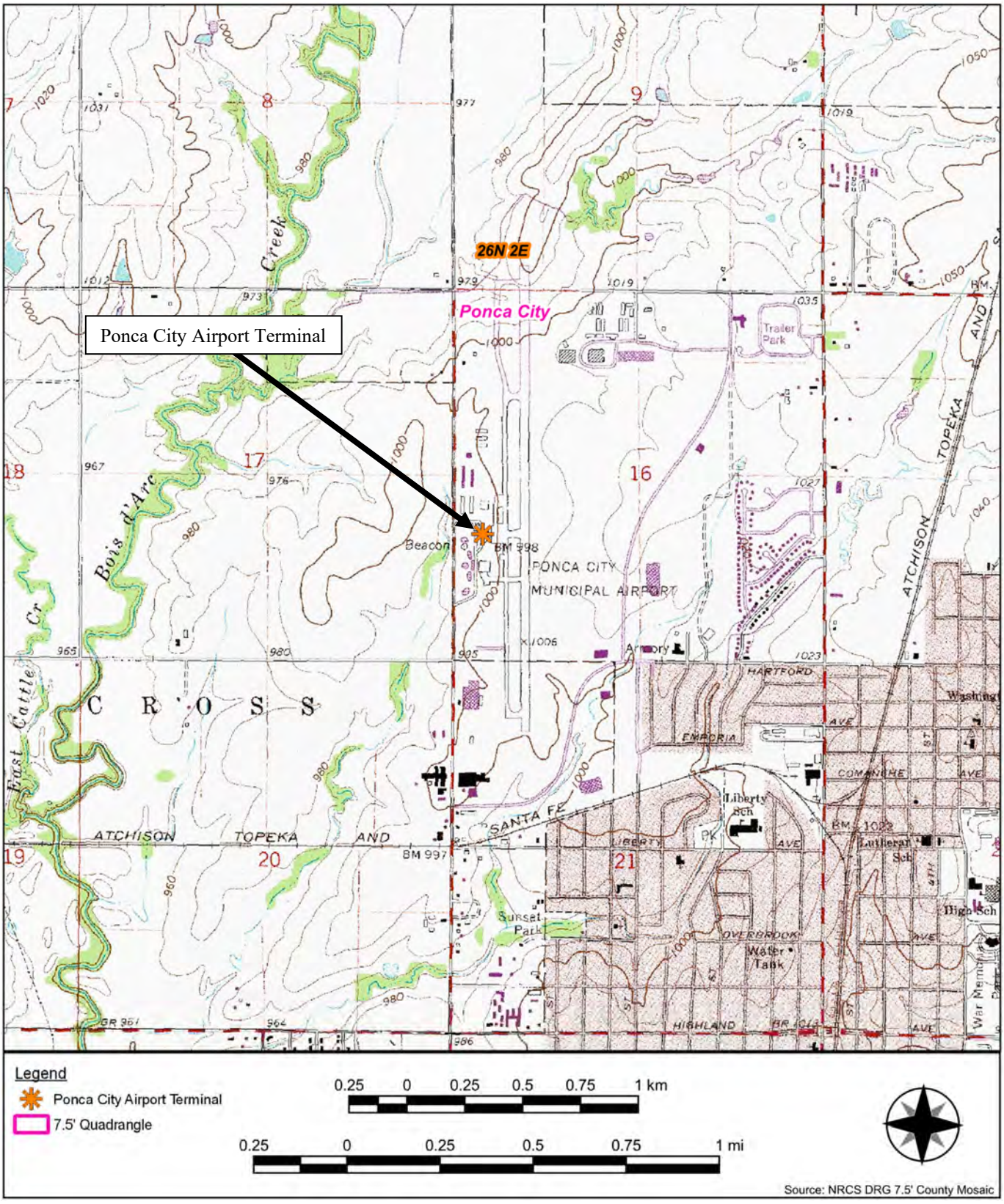


Figure 1. Property on topographic map.

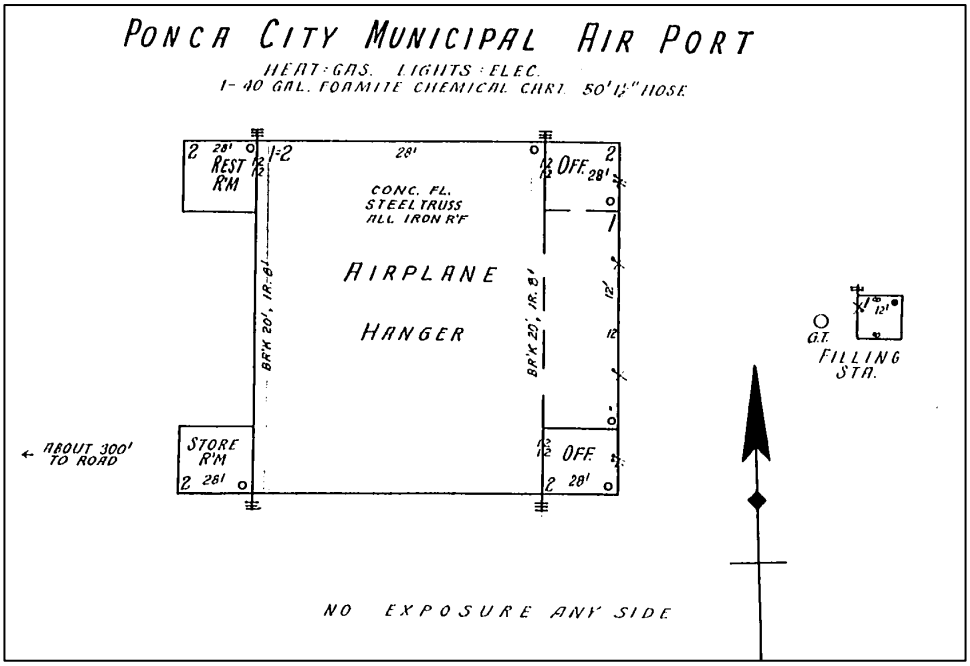


Figure 2. Inset from 1931 Sanborn Fire Insurance Map, showing Ponca City Airport Brick Hangar (OLI #101059)/Ponca City Municipal Airport Hangar (NR #RS100004173).

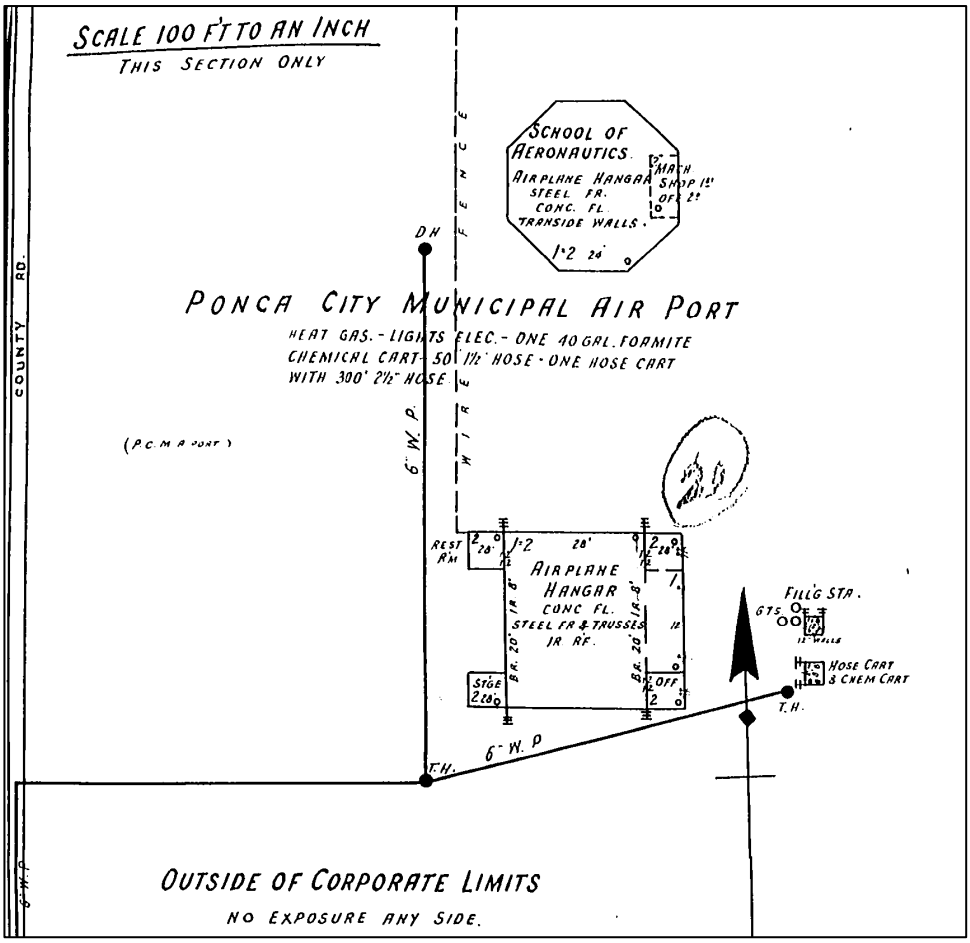


Figure 3. Inset from 1931 Sanborn Fire Insurance Map, showing Ponca City Airport Brick Hangar (OLI #101059)/Ponca City Municipal Airport Hangar (NR #RS100004173) and School of Aeronautics (not extant).

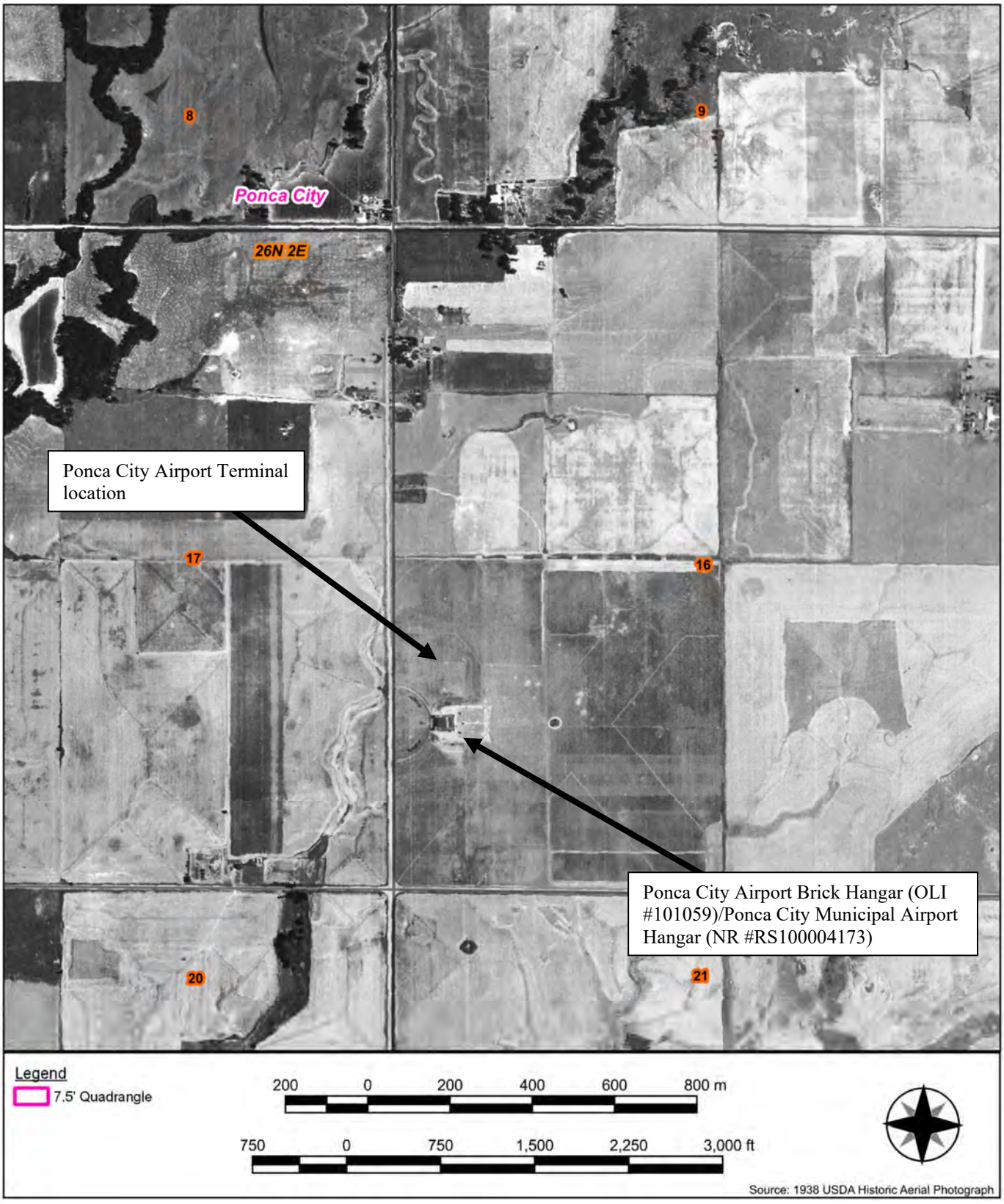


Figure 4. Property location on 1938 aerial photograph.

Figure 5. Property on 1954 aerial photograph.

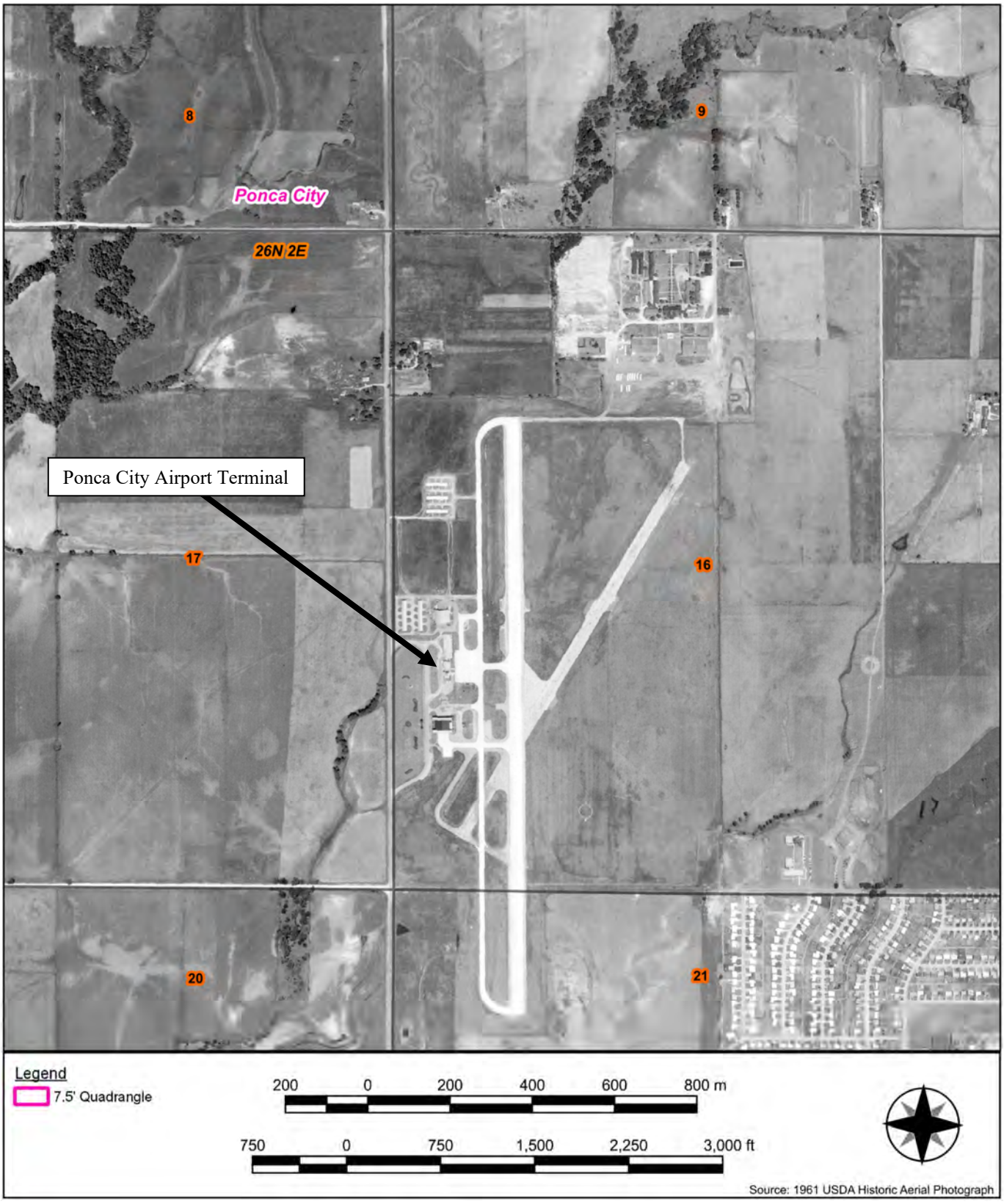


Figure 6. Property on 1961 aerial photograph.

Figure 7. Property on 1973 aerial photograph.

Figure 8. Property on 1980 aerial photograph.

Figure 9. Property on 1995 aerial photograph.

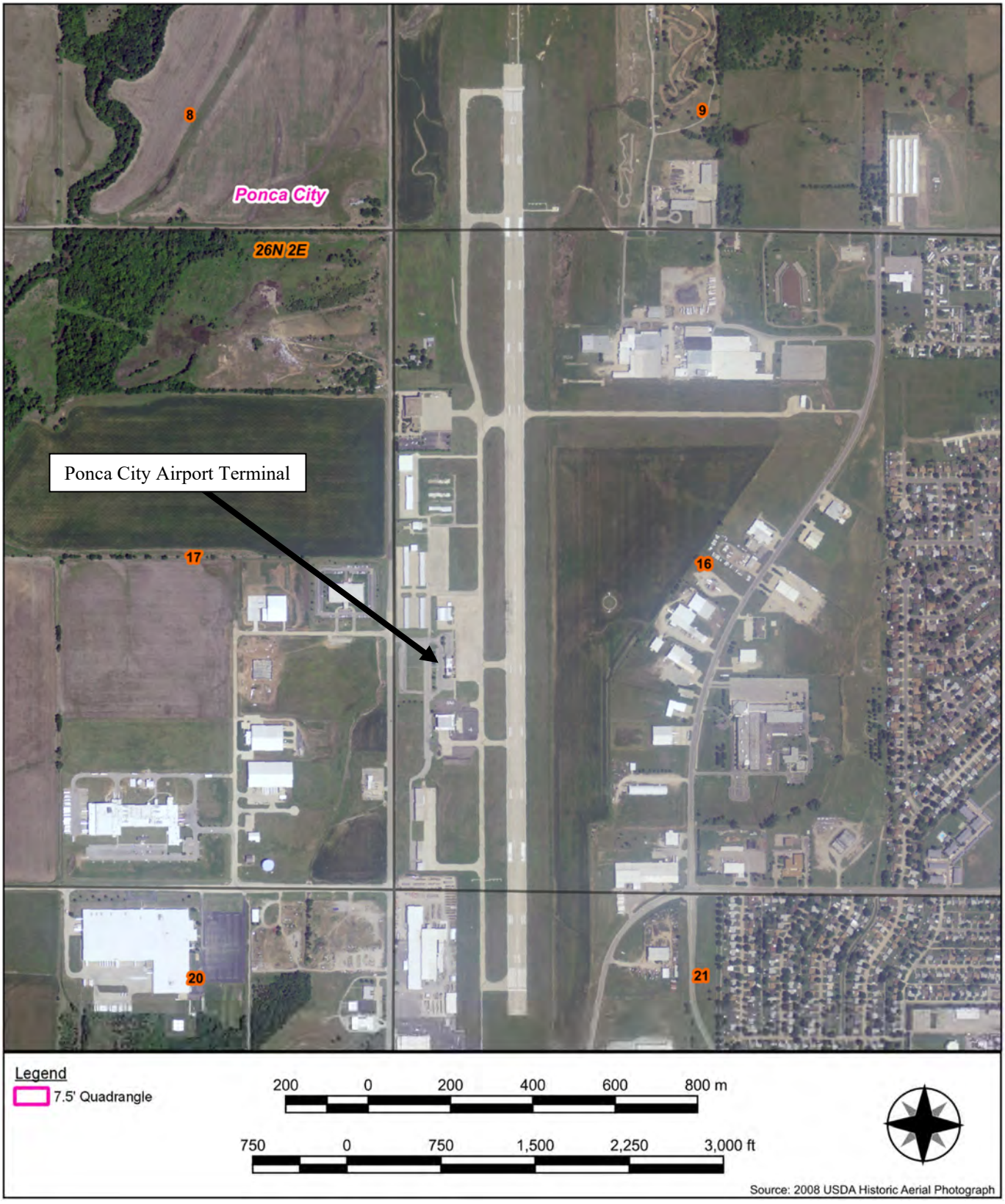


Figure 10. Property on 2008 aerial photograph.

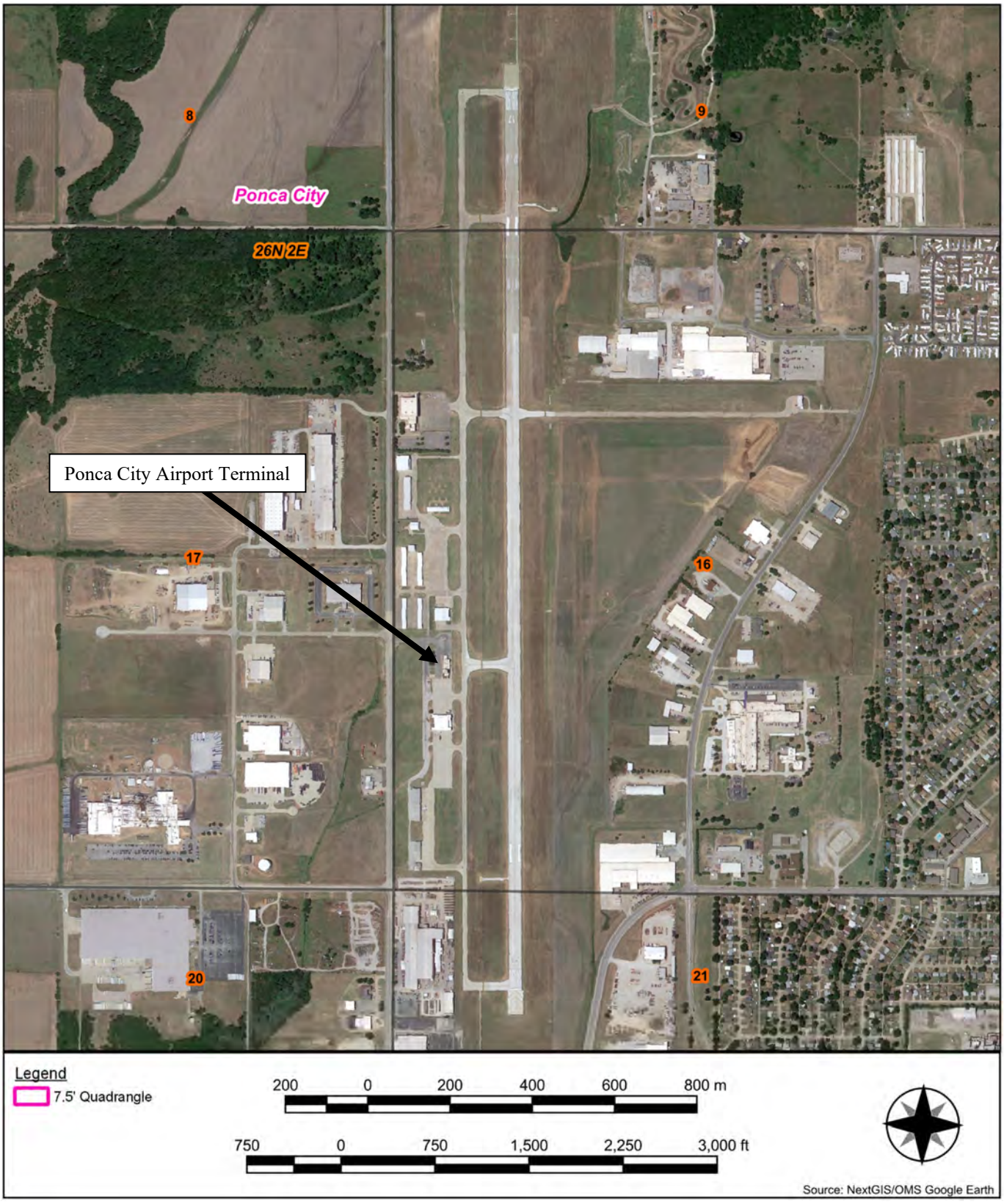


Figure 11. Property on 2022 aerial photograph.

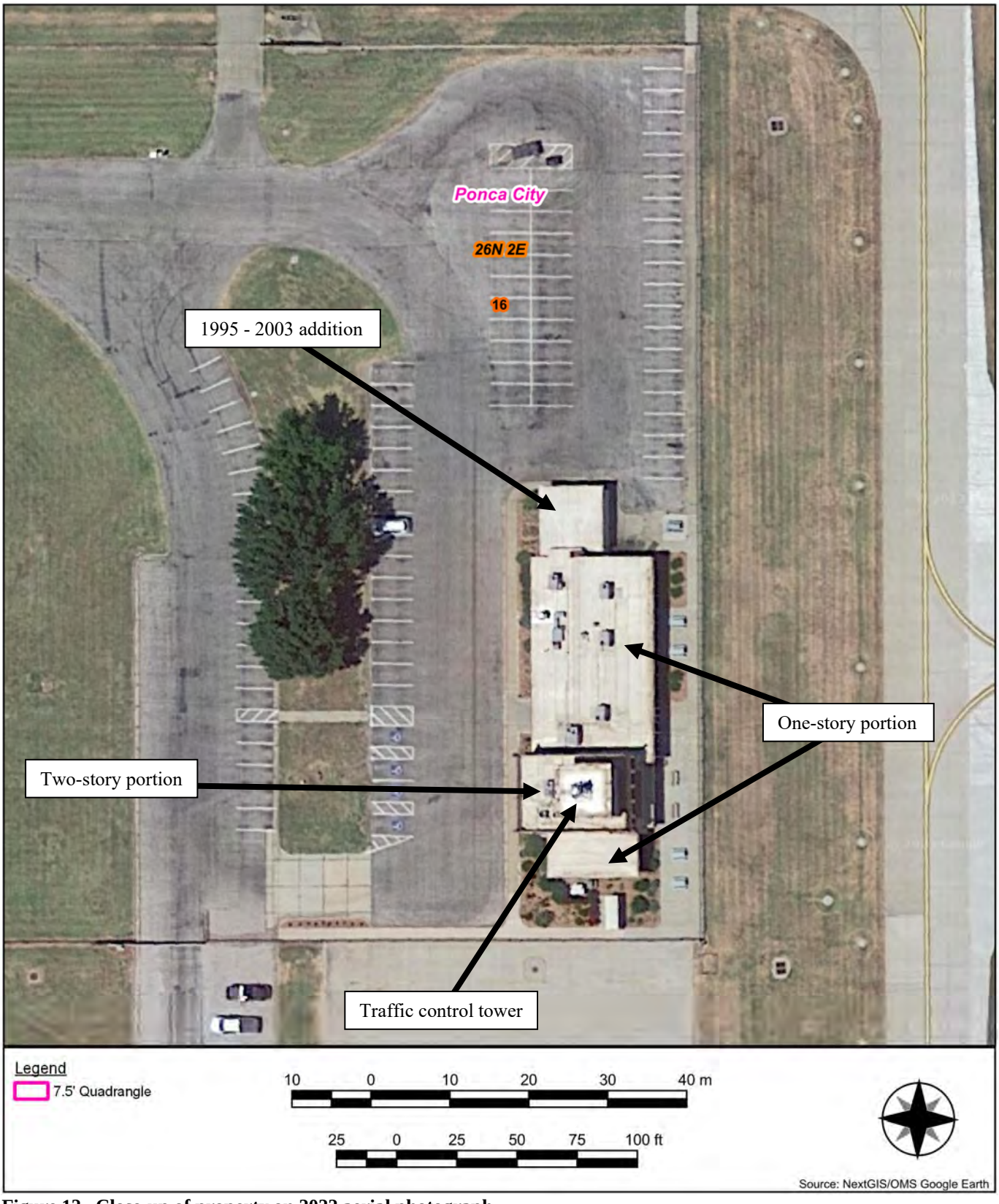
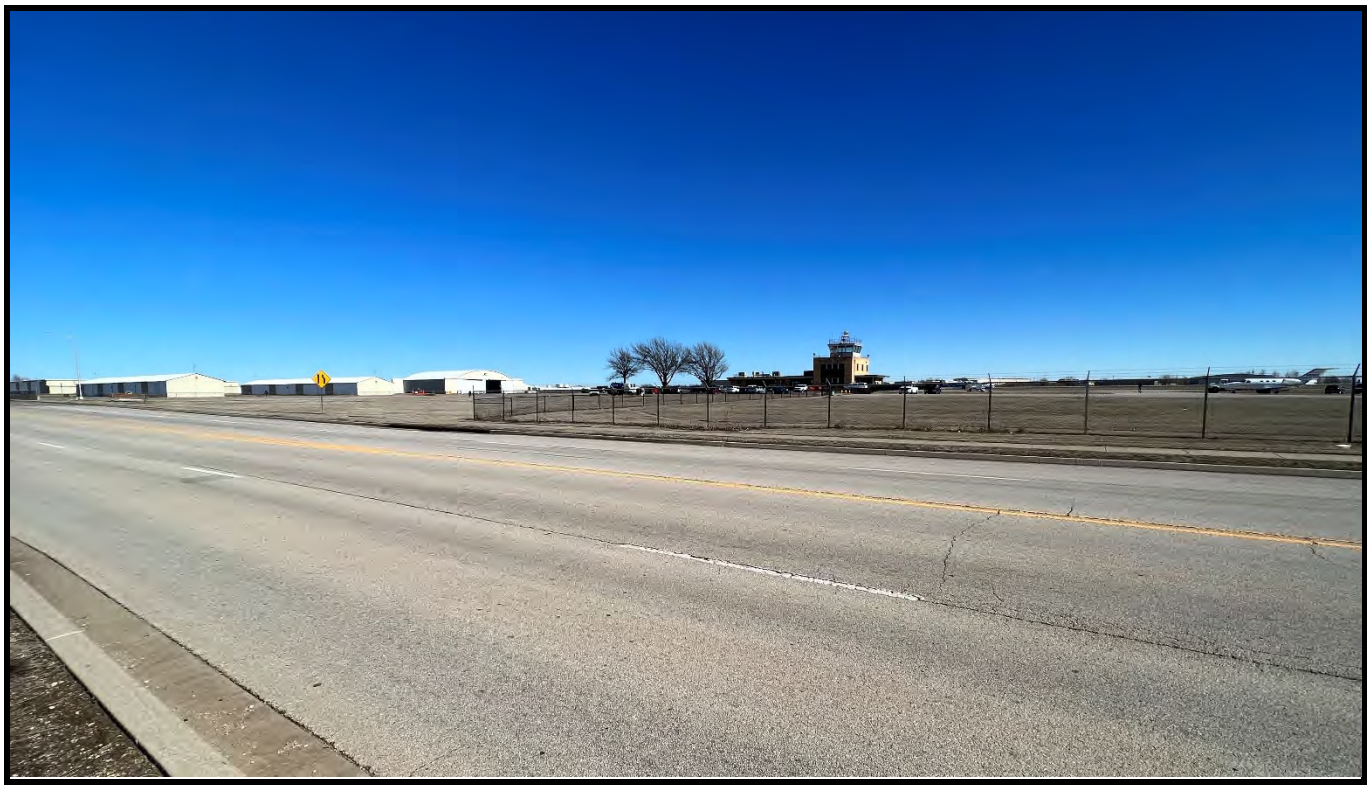


Figure 12. Close-up of property on 2022 aerial photograph.

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal from Waverly St, facing southeast
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 1 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal from Waverly St, facing east
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 2 of 33



Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal from Waverly St, facing northeast
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 3 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal and parking lot, facing southeast
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 4 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal and parking lot, facing southwest
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 5 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal, facing south
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 6 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal, facing southeast

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 7 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal and parking lot, facing east

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 8 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal and parking lot, facing northeast
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 9 of 33

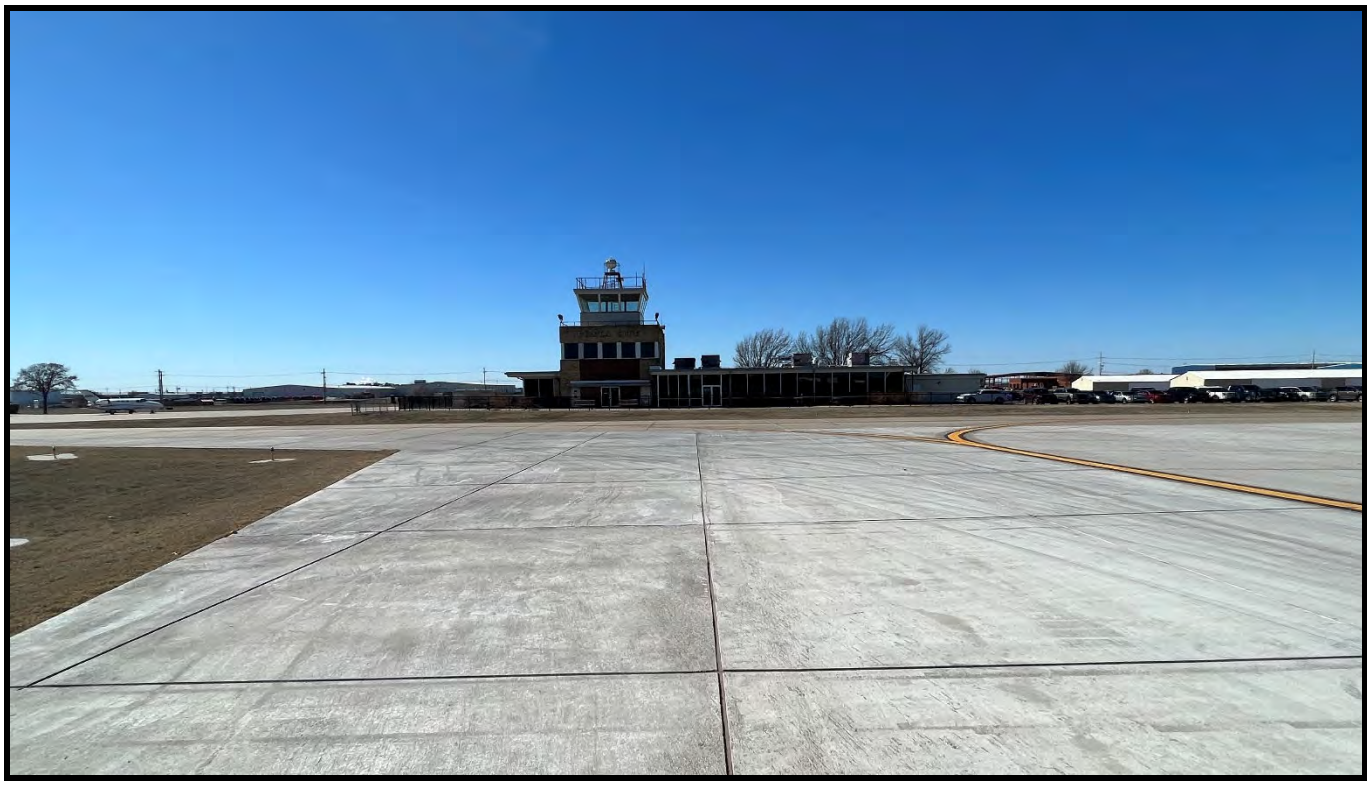
Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal, facing northeast
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 10 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal, facing north

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 11 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal, facing northwest

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 12 of 33



Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal from taxiway, facing west
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 13 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal, facing southwest
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 14 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal addition, facing southwest

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 15 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal addition, facing southwest

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 16 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal addition, facing south

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 17 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal addition, facing southeast

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 18 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal addition, facing east

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 19 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal, facing southeast

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 20 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal, facing northeast
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 21 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal, facing east
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 22 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal, facing northwest

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 23 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal, facing northwest

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 24 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal, facing west

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 25 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal, facing southwest

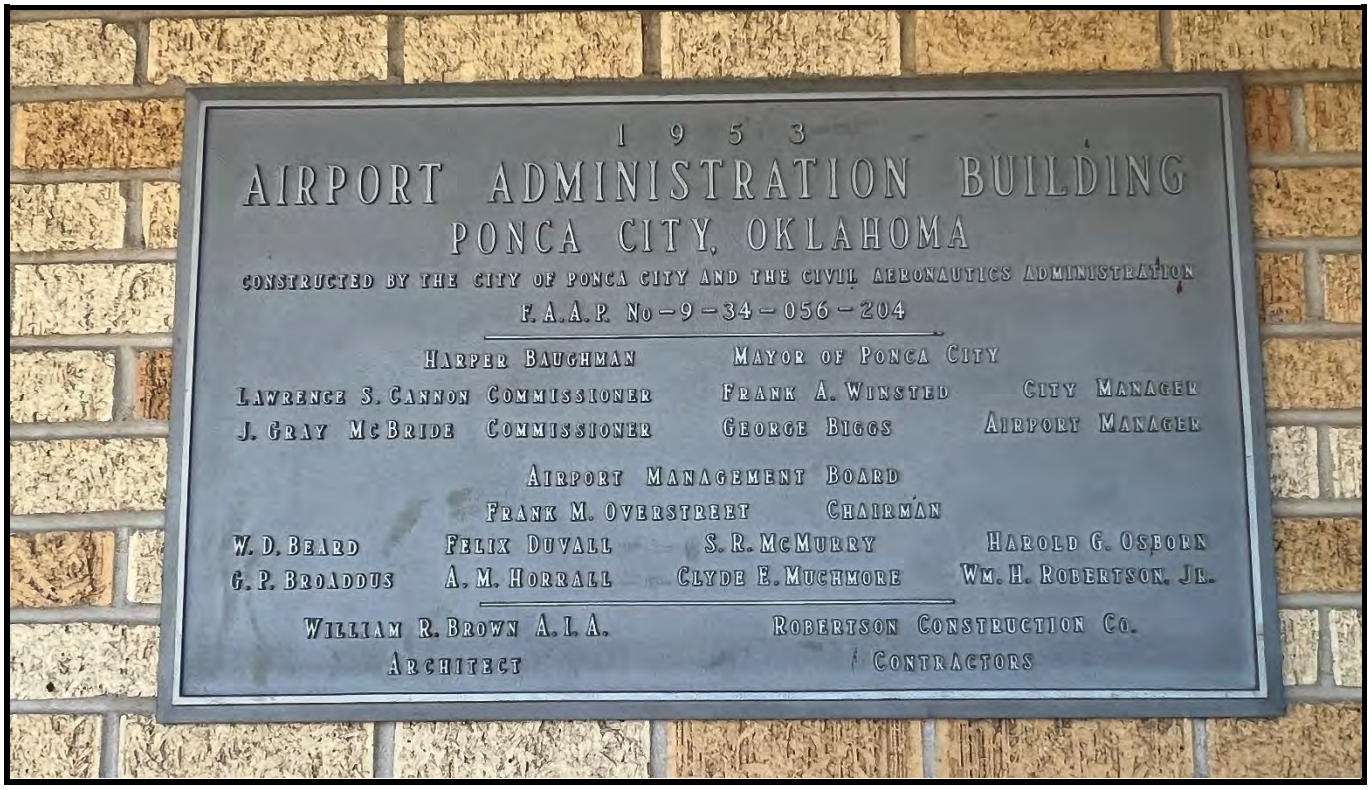
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 26 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal roof, facing south to control tower
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 27 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Control tower, facing south
Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 28 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Control tower, facing northeast

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 29 of 33

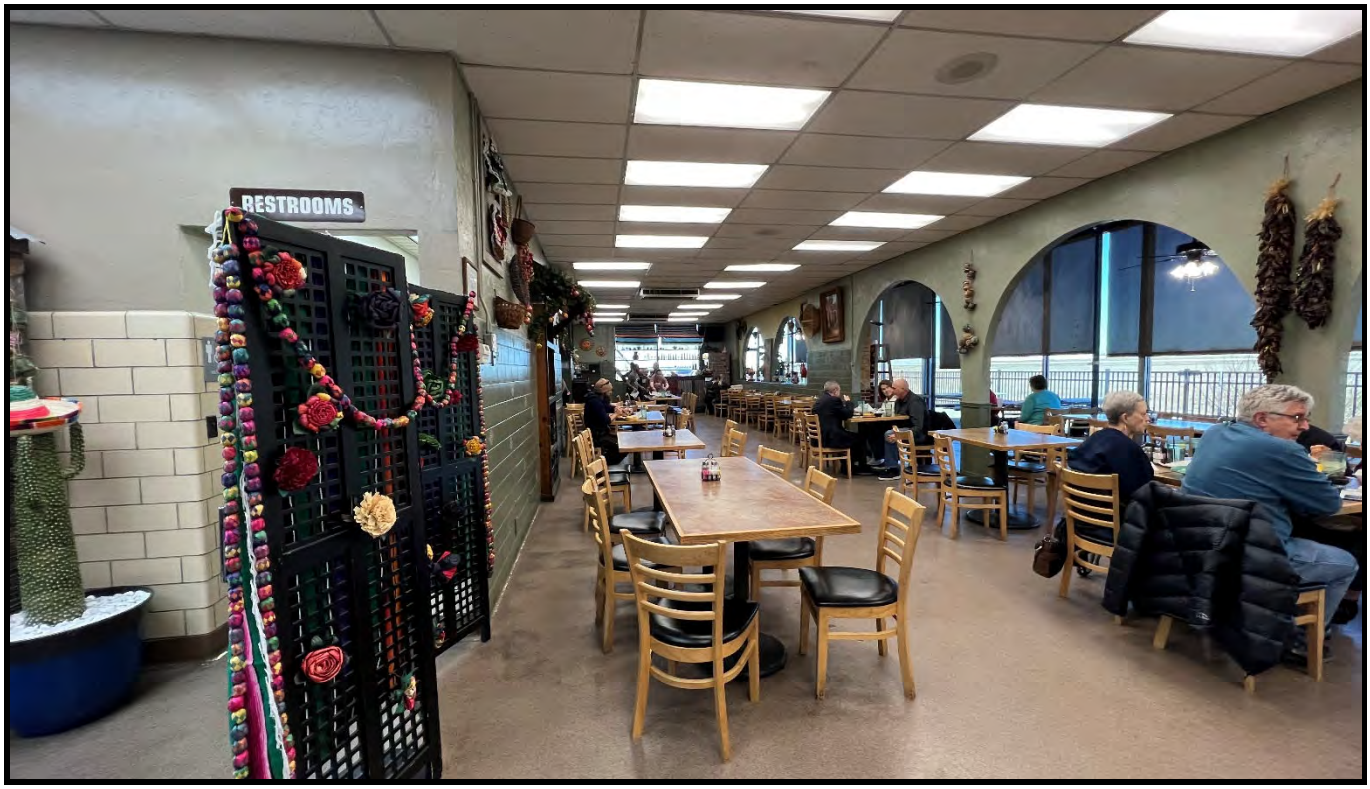


Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal plaque

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 30 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal interior

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 31 of 33



Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Terminal interior, Enrique's Restaurant

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 32 of 33

Property name: Ponca City Airport Terminal
Location: 2213 N Waverly St, Ponca City, OK 74601
Description: Enrique's Restaurant sign

Photographer: Kyle Baker, Afendras Archaeology/LJAES
Date: 2/10/2023
Photograph No.: 33 of 33

U.S. Department of Transportation
Federal Aviation Administration

Arkansas/Oklahoma Airports District Office
Southwest Region

FAA ASW-630
10101 Hillwood Parkway
Fort Worth, Texas 76177

March 29, 2023

Oklahoma Archeological Survey
University of Oklahoma
Attn: Dr. Kary Stackelbeck, State Archaeologist
111 Chesapeake Street
Norman, OK 73019-5111

Subject: Ponca City Regional Airport (PNC) New Terminal Construction
Kay County, Section 16, Township 26N, Range 2E

Dear Dr. Stackelbeck:

The Federal Aviation Administration (FAA) has received a proposal from Ponca City Regional Airport (PNC) for construction of a new terminal building and removal of the airport's current terminal building. The project would be partially funded with FAA grant funds. The issuance of grant funds is a Federal undertaking subject to compliance with Section 106 of the National Historic Preservation Act (NHPA). We are seeking your review of the project under Section 106 of the NHPA.

The objective of the proposed project is to remove the existing terminal building and design and construct a new terminal building, west of the existing terminal. The terminal was constructed in 1953. The new terminal building is intended to meet existing and future needs at PNC as well has increasing passenger/crew capacity.

To assist in this assessment, we are enclosing a completed maps and project exhibits.

Project Location: 2231 Waverly Street in Ponca City, Kay County, OK
Legal Description: Section 16, Township 26 North, Range 2 East

A request for review has also been sent to the Oklahoma State Historical Preservation Office. If you have any questions or require additional information, please feel free to contact me at: Kelly.M.Oliver-Amy@faa.gov or 817-222-5645.

Sincerely,

Kelly Oliver-Amy
Environmental Protection Specialist
Arkansas/Oklahoma Airports District Office

Attachments

Oklahoma Historical Society
State Historic Preservation Office

April 25, 2023

Ms. Kelly Oliver-Amy
Arkansas-Oklahoma Airports Dist. Office
FAA-ASW-630
10101 Hillwood Parkway
Fort Worth, TX 76177

RE: File #1277-23; FAA Proposed New Terminal Project at Ponca City Regional Airport, 2213 Waverly Street, Ponca City, Kay County, Oklahoma

Dear Ms. Oliver-Amy:

We have received and reviewed the documentation submitted on the referenced project in Kay County. We concur with your opinion that the Ponca City Airport Terminal is eligible for the National Register of Historic Places under Criterion A (Economics) and Criterion C (Architecture) at the local level of significance for its association with the post-World War II economic development of Ponca City. The period of significance is 1953, which corresponds to the building's construction.

Further, we concur with your finding that the proposed project will have an **adverse effect** on the Ponca City Airport Terminal.

We welcome the opportunity to continue consultation with you to mitigate, minimize, or eliminate the adverse effect of the proposed project. However, if we are unable to eliminate the adverse effect of the project, the Federal Aviation Administration will need to contact and invite the participation of the Advisory Council on Historic Preservation (ACHP) in order to complete the Section 106 process as outlined in 36 CFR Part 800. Should the ACHP choose not to participate in the consultation, Federal Aviation Administration and the SHPO may execute a Memorandum of Agreement (MOA). Upon the execution of an MOA, a copy must be filed with the ACHP to complete the Section 106 process.

Thank you for the opportunity to review this project. If you have any questions, please do not hesitate to call Kristina Wyckoff, Historical Archaeologist, at 405-521-6381. Please reference the above underlined file number when responding.

Sincerely,

Lynda Ozan
Deputy State Historic
Preservation Officer

LO:pm

800 Nazih Zuhdi Drive, Oklahoma City, OK 73105-7917
405-521-6249 | Fax 405-522-0816 | www.okhistory.org/shpo

Oklahoma Archeological Survey

THE UNIVERSITY OF OKLAHOMA

February 2, 2024

FAA
Attn: Kelly Oliver-Amy
Environmental Protection Specialist
Arkansas/Oklahoma Airports District Office
10101 Hillwood Parkway
Fort Worth, TX 76177

Re: OAS FY24-1083 FAA Proposes Removal of Terminal Building & Construction of New Terminal Building for Ponca City Airport: 2213 Waverly Street, Ponca City.
Legal Description: SW ¼ NW ¼ SW ¼ Section 16, T26N, R2E, Kay County, Oklahoma.

Dear Ms. Oliver-Amy:

The Community Assistance Program staff of the Oklahoma Archeological Survey has reviewed the above referenced project to identify areas that may potentially contain prehistoric or historic archeological materials (historic properties). The location of your project has been crosschecked with the state site files containing approximately 27,000 archaeological sites, which are currently recorded for the state of Oklahoma. No Sites are listed as occurring within your project area, and based on the topographic and hydrologic setting, no archaeological materials are likely to be encountered. Thus, an archaeological field inspection is not considered necessary. **However, we defer opinion on the impacts to the building older than 45 years to the Oklahoma State Historic Preservation Office (SHPO), Oklahoma Historical Society**. Please contact this office at (405) 325-7211 if buried archaeological materials such as chipped stone tools, pottery, bone, historic crockery, glass, metal items or building materials are exposed during construction activities.

This environmental review and evaluation are done in cooperation with the State Historic Preservation Office, Oklahoma Historical Society. The responsible federal agency or their official delegate must also have a letter from that office to document consultation pursuant to Section 106 of the National Historic Preservation Act. In addition to our review comments, under 36CFR Part 800.3 you are reminded of your responsibility to consult with the appropriate Native American tribe/groups to identify any concerns they may have pertaining to this undertaking and potential impacts to properties of traditional and/or ceremonial value.

Sincerely,

Ella M. Brewer-Jensen

Ella Brewer-Jensen
Staff Archaeologist

Kary L. Stackelbeck, Ph.D.
State Archaeologist

: dkg
cc: SHPO

Oklahoma Historical Society
State Historic Preservation Office

February 7, 2024

Ms. Kelly Oliver-Amy
Arkansas-Oklahoma Airports Dist. Office
FAA-ASW-630
10101 Hillwood Parkway
Fort Worth, TX 76177

RE: File #0877-24 [Previously #1277-23]; FAA Proposed New Terminal Project at Ponca City Regional Airport, 2213 Waverly Street, Ponca City, Kay County, Oklahoma

Dear Ms. Oliver-Amy:

We have received your correspondence dated January 25, 2024. As both the federal agency and the SHPO agree on the eligibility of the resource, we look forward to working with the FAA on a mitigation plan for the undertaking. Thank you for providing this information for our records.

We look forward to working with you in the future. For future correspondence pertaining to this project, please reference the above underlined file number. If you have any questions, please contact me at 405-522-4484. Thank you.

Sincerely,

Lynda Ozan
Deputy State Historic
Preservation Officer

LO:pm

800 Nazih Zuhdi Drive, Oklahoma City, OK 73105-7917
405-521-6249 | Fax 405-522-0816 | www.okhistory.org/shpo

March 27, 2024

Kelly Oliver-Amy
Environmental Protection Specialist
Federal Aviation Administration

Ref: *Ponca City Regional Airport New Terminal Construction*
Ponca City, Kay County, Oklahoma
ACHP Project Number: 020691

Dear Ms. Oliver-Amy:

On March 18, 2024, the Advisory Council on Historic Preservation (ACHP) received your notification and supporting documentation regarding the potential adverse effects of the referenced undertaking on a property or properties listed or eligible for listing in the National Register of Historic Places. Based upon the information you provided, we have concluded that Appendix A, *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, of our regulations, "Protection of Historic Properties" (36 CFR Part 800) implementing Section 106 of the National Historic Preservation Act, does not apply to this undertaking. Accordingly, we do not believe our participation in the consultation to resolve adverse effects is needed.

However, if we receive a request for participation from the State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officer, affected Indian tribe, a consulting party, or other party, we may reconsider this decision. Should the undertaking's circumstances change, consulting parties cannot come to consensus, or you need further advisory assistance to conclude the consultation process, please contact us.

Pursuant to Section 800.6(b)(1)(iv), you will need to file the final Section 106 agreement document (Agreement), developed in consultation with the Oklahoma SHPO and any other consulting parties, and related documentation with the ACHP at the conclusion of the consultation process. The filing of the Agreement and supporting documentation with the ACHP is required in order to complete the requirements of Section 106 of the National Historic Preservation Act.

Thank you for providing us with your notification of adverse effect. If you have any questions or require our further assistance, please contact Max Sickler at (202) 517-0220 or by e-mail at msickler@achp.gov and reference the ACHP Project Number above.

Sincerely,

Dana Daniels
Historic Preservation Technician
Office of Federal Agency Programs

ATTACHMENT 5

CONSULTING PARTY DOCUMENTS

From:	Kathryn Stclair
To:	Oliver-Amy, Kelly M (FAA)
Cc:	Derek Blackshare
Subject:	RE: File #1277-23: Ponca City AP Consulting Parties
Date:	Thursday, December 21, 2023 8:29:00 AM
Attachments:	image001.jpg

Hi Kelly,
Great. Tori is a good friend of mine…I didn't realize she was the Board President!
Are you ready to review the draft consulting party letter and the draft tribal letter? I can send them over to you.
Thank you,
Kathryn

From: Oliver-Amy, Kelly M (FAA)
Sent: Thursday, December 21, 2023 8:02 AM
To: Kathryn Stclair
Subject: FW: File #1277-23: Ponca City AP Consulting Parties

[EXTERNAL EMAIL]

Hello Kathryn,
Here is the response back from SHPO regarding the consulting parties list. Kristina had one correction.
Thank you! Kelly

Kelly Oliver-Amy
Environmental Protection Specialist
FAA-Southwest Region
Arkansas/Oklahoma Airports District Office, ASW-630
10101 Hillwood Pkwy, Fort Worth, TX 76177-1524
Email: Kelly.M.Oliver-Amy@faa.gov
Phone: 817-222-5645

From: Kristina Wyckoff <Kristina.Wyckoff@history.ok.gov>
Sent: Friday, December 15, 2023 1:53 PM
To: Oliver-Amy, Kelly M (FAA) <Kelly.M.Oliver-Amy@faa.gov>
Subject: Re: File #1277-23: Ponca City AP Consulting Parties

Amy,
Thank you for reaching out to our office with your draft list of consulting parties. Chantry Banks has taken a new position and is no longer the director of Preservation Oklahoma. I would encourage you to direct correspondence to Preservation Oklahoma's Board President, Tori Raines at tori.l.raines@gmail.com . Please also ensure that you are consulting with interested tribes.
If you would like to provide a draft MOA for our review, please email a word document for our review and comment directly to Lynda Ozan, Deputy State Historic Preservation Officer at lynda.ozan@history.ok.gov .
Let me know if you have other questions.
Thank you,
Kristina

Kristina Wyckoff

SECTION 106 COORDINATOR | HISTORICAL ARCHAEOLOGIST

Oklahoma Historical Society

800 Nazih Zuhdi Drive

Oklahoma City, OK 73105

405-521-6381

okhistory.org

From: Oliver-Amy, Kelly M (FAA) <Kelly.M.Oliver-Amy@faa.gov>
Sent: Tuesday, November 28, 2023 9:31 AM
To: Kristina Wyckoff <Kristina.Wyckoff@history.ok.gov>
Subject: [EXTERNAL] File #1277-23: Ponca City AP Consulting Parties

Good Morning,
I hope you are doing well!
Ponca City and their consultants are ready to move forward with the Section 106 process for the adverse effect to the terminal. We met with them before Thanksgiving and discussed process and such. They have sent us the draft consulting parties list below, and I wanted to ask for your input and suggestions/additions. Can you please review the list below and provide any additions?
I also wanted to ask what your office's preferred communication method would be for the process. I know for initial Section 106 consultations we send you hard copy letters, but would email work since we have started the process? Please let me know you thoughts on that.
Thank you so much!
Kelly

Kelly Oliver-Amy
Environmental Protection Specialist
FAA-Southwest Region
Arkansas/Oklahoma Airports District Office, ASW-630
10101 Hillwood Pkwy, Fort Worth, TX 76177-1524
Email: Kelly.M.Oliver-Amy@faa.gov
Phone: 817-222-5645

From: Kathryn Stclair <kstclair@horizon-esi.com>
Sent: Wednesday, November 15, 2023 12:03 PM
To: Oliver-Amy, Kelly M (FAA) <Kelly.M.Oliver-Amy@faa.gov>
Cc: Derek Blackshare <dblackshare@blackshare-env.com>
Subject: Ponca City AP Consulting Parties

Hello Kelly,
Below is a table of consulting parties that I have compiled thus far. I am working on getting some

specific emails, but we can start with this list for your circulation to the City and the SHPO for their approval. Please reach out with any questions.

Organization	Contact Person	Email/Phone	Address
Ponca City Main Street	Maci Graves	admin@poncacitymainstreet.com 580-763-8082	400 E. Central, Suite 201 G Ponca City, OK 74601
Ponca City Historic Preservation	Rhonda Skrapke	grants@poncacityok.gov	516 E. Grand Ave. Ponca City, OK 74601 580-763-8094
Preservation Oklahoma	Chantry Banks, Executive Director	director@preservationok.org	The Henry and Anna Overholser Mansion Carriage House 405 NW 15th Street Oklahoma City, OK 73103
American Institute of Architects (Central Oklahoma Chapter)	*Seeking contact*	melissa@aiacoc.org 405.948.7174	2220 N. Classen Blvd., Suite A Oklahoma City, OK 73106-6834 United States
American Institute of Architects (Eastern Oklahoma Chapter)	Anthony Meave, AIA, Director And Shane Aaron, AIA	*Seeking email*	Beck Design 110 W. 7th St., Suite 710 Tulsa, OK 74119 (918) 583-5300: Selser Schaefer Architects 2002 E. 6th St. Tulsa, OK 74104 (918) 587-2282
SHPO (OHS)	Lynda Ozan		Oklahoma Historical Society State Historic Preservation Office Oklahoma History Center 800 Nazih Zuhdi Drive Oklahoma City OK 73015
ACHP	*Online Form*	*Online Form*	*Online Form*
Ponca City Regional Airport	Don Nuzum Airport Manager	airport@poncacityok.gov	2213 N. Waverly St. Ponca City, OK 74601

Thank you,
Kathryn

Kathryn St. Clair
Architectural History Manager
Horizon Environmental Services.
www.horizon-esi.com | TBPG Firm No. 50488 | An LJA Company
1507 S. Interstate 35, Austin, TX 78741-2502

Tribal Name	Last Name	First Name	Title	City
Apache Tribe of Oklahoma	Cooper	Durell	Chairman	Anadarko
Apache Tribe of Oklahoma	Komardley	Bobby	Chairman	Anadarko
Cherokee Nation	Toombs	Elizabeth	THPO	Tahlequah
Cheyenne and Arapaho Tribes, Oklahoma	Bear	Max	THPO	Concho
Cheyenne and Arapaho Tribes, Oklahoma	Wassana	Reggie	Governor	Concho
Kaw Nation, Oklahoma	Jenkins	Kimberely	Chairwoman	Kaw City
Osage Nation	Hunter	Andrea A.	Director and THPO	Pawhuska
Tonkawa Tribe of Indians of Oklahoma	Martin	Russell	President	Tonkawa
Tonkawa Tribe of Indians of Oklahoma	Norman-Brown	Lauren	THPO	Tonkawa
Wichita and Affiliated Tribes (Wichita, Keechi, Waco & Tawakonie), Oklahoma	McAdams	Gary	THPO	Anadarko
Wichita and Affiliated Tribes (Wichita, Keechi, Waco & Tawakonie), Oklahoma	Parton	Terri	President	Anadarko

Ponca City Airport Terminal (PNC)

Consulting Party Meeting Agenda
January 13, 2025
1:00 CST

I. Welcome/Introductions

- Purpose of the Call: Provide information on the demolition of the Ponca City Terminal Building and provide an opportunity for discussion and feedback from consulting parties

II. Purpose and Need of the Project: ***Derek Blackshare, P.E.; Blackshare Environmental Solutions***

- Purpose: Meet current FAA design standards, betterment of safety, efficiency, and capacity
- Need: The current terminal is outdated and inefficient for security, infrastructure, and technology. It was also constructed in such a way that it obstructs the FAA Part 77 Transitional Surface (from the runway)

III. Project Background

- History of the Ponca City Airport Terminal

IV. Applicable Regulatory Statutes

- NEPA
- Section 4(f) of the DOT Act
- Section 106 of the NHPA

V. Alternatives Considered to Address the Purpose and Need: ***Tyler McDonald, LBR Inc***.

- Alternative A: No Action – current terminal continues in use
- Alternative B: Proposed Action – demolish current terminal, build larger and updated terminal, construct a new parking lot, and make apron improvements on the east side of the terminal.

VI. Coordination and Communication Completed to Date

- SHPO: Cultural Resource Survey Report and Effects Determination
- THPO: Coordination and Osage Nation data request and response
- ACHP: Coordination and Participation Decline
- State and Community Interest Organizations

VII. Regulatory Process Timeline (Section 106 NHPA and Section 4(f) DOT Act)

- Review Completed Steps and Next Steps

VIII. Potential Mitigation Options

- Historic American Building Survey (HABS)
- Interpretive Signage
- QR Code with Information on the Terminal Building
- Weblink with Information on the City of Ponca City Website
- Drone and Lidar Imagery Documentation (building tour)
- Retention of Signage and/or other features
- Other

IX. Discussion/Questions

X. Action Items

Horizon™
Environmental Services

Meeting Notes

Date: 01/13/2025 at 1:00 CT; Virtual via Teams

Project: Ponca City Airport Terminal (PNC)

Participants: Don Nuzum; Kelly Oliver-Amy, John MacFarlane; Derek Blackshare; Tyler McDonald; Dean Afendras; Breanne Gonzales Jackson; Sara Werneke; Kristina Wyckoff, Rhonda Skrapke; Kathryn St. Clair and Victoria Sisco.

RE: Consulting Parties Meeting

I. Welcome/Introductions

Kathryn St. Clair (Horizon Environmental) opened the call by welcoming participants and invited Kelly Oliver-Amy to introduce the meeting topic. Kelly provided an overview of the project and outlined the purpose of the call, which was to share information regarding the demolition of the Ponca City Airport Terminal and to facilitate discussion and feedback from the consulting parties. Following this, all participants introduced themselves. Kathryn St. Clair (Horizon) then presented a brief summary of the meeting agenda.

II. Purpose and Need of the Project

Derek Blackshare (Blackshare Environmental) presented the purpose and need for the project, highlighting the following key points:

- **Addressing the Need**: The existing terminal, constructed in 1952, is inadequate in terms of infrastructure and technology to meet current operational demands.
- **Regulatory Compliance**: The current terminal is in violation of Part 77 of FAA regulations due to encroachment and visual intrusions.
- **Compliance with FAA Standards**: The proposed new terminal will meet FAA regulations, specifically Part 77, as the existing terminal obstructs aircraft approach visibility. Additionally, it will address the outdated infrastructure and technology of the current facility.
- **Project Purpose**: The primary purpose of this project is to address these issues and fulfill the identified needs.

III. Project Background

Kathryn St. Clair presented the historical background of the Ponca City Airport Terminal, noting the following key points:

- The airport complex was established in 1930 to serve as a training facility for the British and U.S. forces.
- Construction of the terminal was completed in 1952-1953, reflecting the modernist movement in its architectural design.

- The State Historic Preservation Office (SHPO) has determined that the terminal meets Criterion A for its representation of economic development in Ponca City, as well as Criterion C for its architectural significance.

IV. Applicable Regulatory Statutes

Kathryn St. Clair provided an overview of the regulatory statutes applicable to the project, which include:

- **The National Environmental Policy Act (NEPA):** NEPA requires federal agencies to assess the environmental effects of their proposed actions before making decisions. It aims to ensure that environmental factors are considered in decision-making processes.
- **Section 4(f) of the Department of Transportation (DOT) Act:** Section 4(f) prohibits the use of publicly owned land, including parks, recreation areas, wildlife refuges, and historic sites, for transportation projects unless there is no feasible and prudent alternative.
- **Section 106 of the National Historic Preservation Act (NHPA):** Section 106 requires federal agencies to consider the effects of their undertakings on historic properties. This process ensures that significant historic sites are protected and preserved during the development of federal projects.

V. Alternatives Considered to Address the Purpose and Need:

Tyler McDonald (LBR Inc.) presented the alternatives considered to address the safety concerns at the terminal, as outlined below:

- **Alternative A: No Action** – The existing terminal would remain in operation without any changes.
- **Alternative B: Proposed Action** – The existing terminal would be demolished and replaced with a larger, updated facility. This alternative also includes the construction of a new parking lot and improvements to the apron on the east side of the terminal.

Tyler McDonald (LBR Inc.) presented the proposed design for the new terminal using 3D models and site maps. He highlighted that the historically significant Greenwood hangar would not be demolished, but rather integrated into the new terminal's design. The proposed terminal would be relocated 350 feet from its current position. Additionally, the plan includes an increase in customer parking spaces from 100 to 140. The new terminal design also accommodates a restaurant within the facility, with logistics for the restaurant operations provided as part of the presentation.

VI. Coordination and Communication Completed to Date

Kathryn St. Clair outlined the process the project has undergone to date, as well as the next steps in the project timeline:

- **SHPO**: Completion of the Cultural Resource Survey Report and Effects Determination.
- **THPO**: Coordination with Tribal Organizations. The Osage Nation requested an archeological survey, which was provided. They reviewed it and determined no adverse effects on cultural resources. No other organizations responded.
- **ACHP**: Coordination with the Advisory Council on Historic Preservation via their electronic form; they declined to participate at this time.
- **State and Community Interest Organizations**: Invited organizations to participate in the consultation process.

Consulting Party: John MacFarlane (FAA)

Comment:
Mr. MacFarlane (FAA) emphasized that the general public is allowed to comment on the report (EA, MOA and Section 4(f) documentation prior to the finalization of all documents.

Response:
Kathryn Stclair acknowledged his input and confirmed that this suggestion would be implemented moving forward.

VII. Potential Mitigation Options

Kathryn St. Clair presented the following mitigation options for consideration:

- Historic American Building Survey (HABS) Level II
- Interpretive Signage
- QR Code providing Information on the Terminal Building
- Weblink with Information on the City of Ponca City Website
- Drone and Lidar Imagery Documentation (including a building tour)
- Retention of Signage and/or other distinctive features
- Additional Mitigation Measures

VIII. Discussion/Questions

Consulting Party: Sara Werneke (SHPO/Oklahoma Historical Society [OHS])

Comment: Ms. Werneke inquired whether a discussion had taken place regarding the option of rehabilitating the existing terminal, as opposed to demolishing it and constructing a new one.

Response: Tyler McDonald explained that discussions took place between Ponca City, the city's engineer, and the architect. However, it was determined that numerous features of the existing terminal are outdated, making rehabilitation more costly than constructing a new terminal.

Consulting Party: Sara Werneke

Comment: Ms. Werneke emphasized the importance of including all discussions in the mitigation list of alternatives. This ensures that both the work and the topics discussed are documented in writing.

Response: Kristina Wyckoff (SHPO/OHS) and Kelly Oliver-Amy (FAA) concur that the rehabilitation option is not feasible and should be documented as an alternative in the alternative analysis under Section 4(f) and NEPA.

Consulting Party: Sara Werneke

Comment: Ms. Werneke expressed her dissatisfaction with the HABS option for project mitigation, stating that it was insufficient. She proposed utilizing a Story Map as an alternative approach. Additionally, she suggested installing a display within the new terminal to serve as a physical tribute to the old terminal, preserving its historical significance. While she appreciated the architectural style of the new terminal and its homage to the adjacent hangar, she noted that the two structures originate from different eras and, as a result, do not align aesthetically.

Response: Kathryn St. Clair inquired into HABS being insufficient.

Consulting Party: Sara Werneke

Comment: Ms. Werneke further acknowledged that HABS is a valuable digital tool for public use. However, she emphasized her desire to see a physical tribute to the old terminal, rather than relying solely on a digital archive. She expressed the importance of making this physical tribute accessible and easily understandable for the public.

Response: Rhonda Skrapke (City of Ponca City) suggested the creation of a "coffee table book" featuring the old terminal, providing guests with an opportunity to review and read about its history.

Consulting Party: Sara Werneke

Comment: Ms. Werneke stated that as much information as possible should be made accessible to the public and noted that digital Story Maps serve as the modern equivalent of "coffee table books."

Consulting Party: Rhonda Skrapke

Comment: Ms. Skrapke recommended the installation of interpretive panels in the historic hangar to incorporate its history into the renovation.

Consulting Party: Kristina Wyckoff

Comment: Ms. Wyckoff proposed combining a physical representation of the old terminal, such as a book, with a digital archive to preserve and memorialize its history.

Response: Rhonda Skrapke agreed with Ms. Wyckoff's statement.

Consulting Party: John MacFarlane (FAA)

Comment: Mr. MacFarlane proposed a modified HABS Level Two approach, incorporating a kiosk or interpretive signage inside the new terminal. Given the new terminal's design, which includes walls of windows, he recommended positioning the kiosks or signage to face the location of the old terminal, allowing viewers to better understand the original placement of the structures.

Response: Sara Werneke voiced her agreement with Mr. MacFarlane's statement.

Consulting Party: Sara Werneke

Comment: Ms. Werneke inquired with Kristina Wyckoff regarding whether this project would require a HABS Level Two.

Response: Kristina Wyckoff agreed with Ms. Werneke's question.

Participant: Kathryn St. Clair

Comment: Ms. St. Clair inquired with Kristina Wyckoff about the filing of HABS in the project process and requested further elaboration.

Response: Kristina Wyckoff stated that the OK SHPO office serves as a repository for the Oklahoma Archives and is affiliated with the Smithsonian Institution.

Participant: Kathryn St. Clair

Comment: Ms. St. Clair inquired whether the documents are reviewed for compliance with DOI requirements.

Response: Sara Werneke confirmed that it is.

Kathryn Stclair reviewed the panel's notes and comments before concluding the discussion. She outlined the next steps in drafting the Memoranda of Agreement (MOA). Ms. St. Clair inquired if Kristina Wyckoff could provide example documents for review, to which Ms. Wyckoff shared a link in the meeting's dialogue box, along with the SHPO Agency agreements.

Ms. St. Clair closed the meeting by thanking all participants for their time and contributions, and informed the group that the meeting notes would be distributed. Additionally, the draft MOA would be circulated to the FAA, Consulting Parties, and the public for comments.

ATTACHMENT 6

DRAFT MEMORANDUM OF AGREEMENT

Project Description

The FAA received a proposal from Ponca City Regional Airport (PNC) for construction of a new terminal building and removal of the airport's current terminal building. The PNC is located at 2231 Waverly Street, Kay County, Ponca City, Oklahoma, on land owned by the City of Ponca City. The objective of the proposed project is to construct a new terminal building, 350 feet west of the existing terminal building, and remove the existing terminal building. The current Ponca City Airport Terminal building was constructed in 1953. The new terminal building is intended to comply with FCC airport standards, correct an encroachment of FAA airspace, add passenger and crew capacity, be more efficient, and improve security and technology.

The existing terminal would be demolished and replaced with a larger, updated facility. The proposed project also includes the construction of a new parking lot on the west side of the new terminal and improvements to the apron on the east side of the new terminal. Additional parking capacity will be added. The new terminal design also accommodates a restaurant within the facility, with logistics for the restaurant operations provided as part of the presentation.

The project would be partially funded with FAA grant funds. The issuance of grant funds is a Federal undertaking subject to compliance with Section 106 of the National Historic Preservation Act (NHPA). The Ponca City Airport Terminal is eligible for the National Register of Historic Places under Criterion A (Economics) and Criterion C (Architecture) at the local level of significance for its association with the post-World War II economic development of Ponca City. The period of significance is 1953, which corresponds to the building's construction.

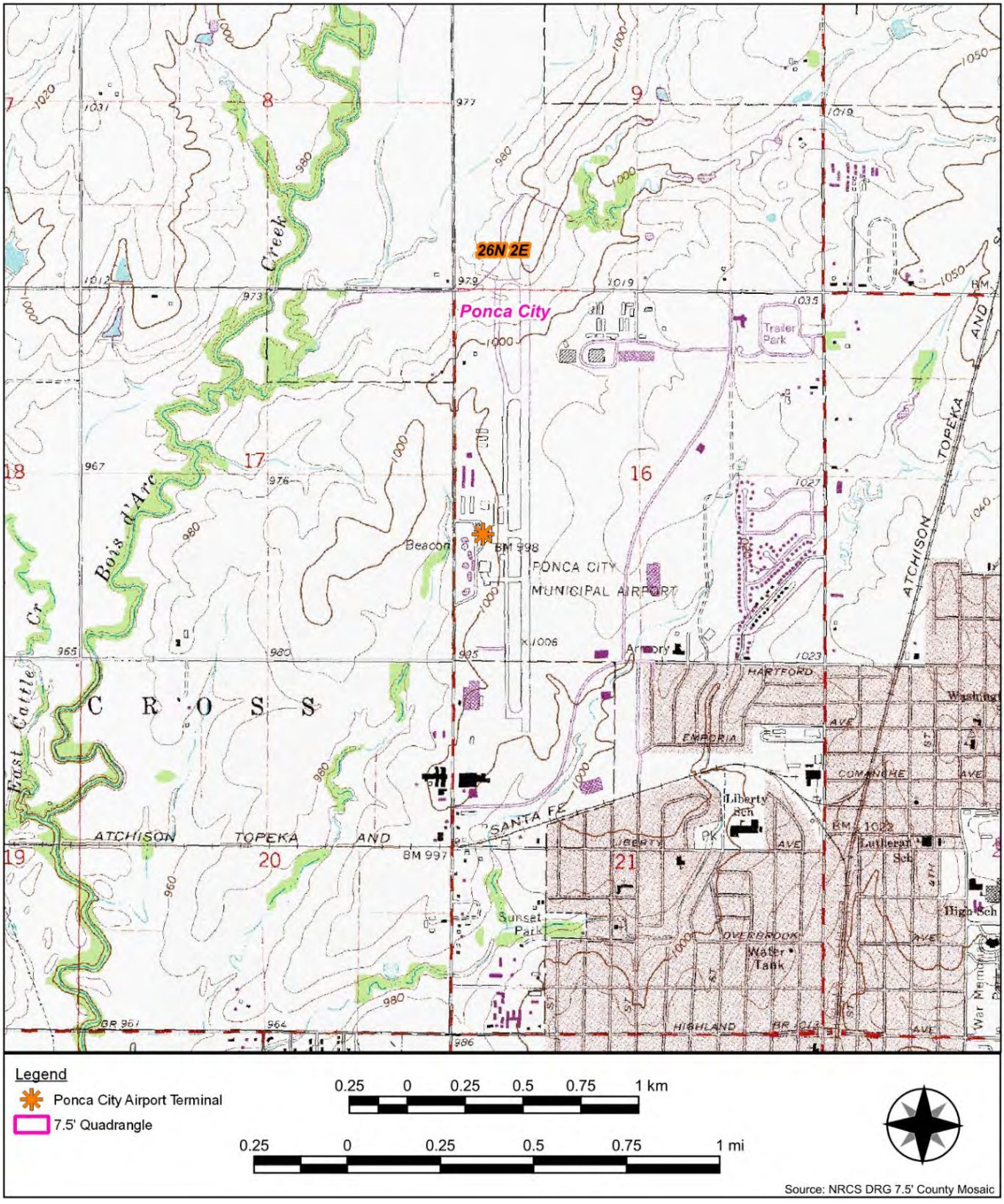


Figure 1: Project Location Map

MEMORANDUM OF AGREEMENT
AMONG THE FEDERAL AVIATION ADMINISTRATION (FAA), PONCA CITY REGIONAL AIRPORT (PNC), AND THE OKLAHOMA STATE HISTORIC PRESERVATION OFFICER (SHPO), REGARDING THE PONCA CITY AIRPORT TERMINAL PROJECT, CITY OF PONCA CITY, KAY COUNTY, OKLAHOMA

WHEREAS, the City of Ponca City, acting through its Ponca City Regional Airport (PNC), is proposing to construct a new terminal building and demolish the existing Terminal Building (Attachment A: Project Description); and

WHEREAS, the proposed PNC Terminal Replacement Project (the Project) traverses through the county of Kay (Attachment B: Location Map); and

WHEREAS, an engineering assessment of the PNC Terminal indicates that the existing terminal, constructed in 1953, obstructs aircraft approach visibility in conflict with FAA standards, is inadequate in terms of infrastructure and technology to meet current operational demands; and

WHEREAS, the Project is an undertaking as defined in 36 C.F.R. § 800.16 (2014) subject to review under Section 106 of the National Historic Preservation Act [54 U.S.C. § 306108 (2014)] (NHPA) and its implementing regulations at 36 C.F.R. § 800 (2014), and the Federal Aviation Administration (FAA) and PNC have consulted with the Oklahoma Archeological Survey (OAS) and Oklahoma Historical Society (OHS) acting as the State Historic Preservation Officer (SHPO), and federally-recognized tribal organizations to consider the effects of the undertaking on historic properties; and

WHEREAS, the FAA submitted a Request for SHPO (OHS and OAS) Coordination on March 29, 2023 describing the proposed demolition of the PNC Terminal and recommended the building as eligible for listing in the National Register of Historic Places (NRHP); and

WHEREAS, in a letter dated April 25, 2023, the SHPO responded concurring that the PNC Terminal is eligible for listing in the NRHP and responded that if demolition cannot be prevented on the PNC Terminal, then the project would have adverse effects on the PNC Terminal and appropriate mitigation measures are to be prepared and the FAA will need to enter into a Memorandum of Agreement (MOA) to resolve adverse effects an MOA to resolve adverse effects pursuant to 36 C.F.R. § 800.6(c) (2014), which will govern the implementation of the undertaking and satisfy FAA's obligation to comply with Section 106; and

WHEREAS, in consultation with the SHPO and the City of Ponca City, the FAA prepared a list of tribal organizations and consulting parties to notify of the Project. In a letter dated January 29, 2024, the FAA notified federally recognized tribal organizations and consulting parties of the proposed Project, and invited parties to participate in the consultation process; and

WHEREAS, in a letter dated February 2, 2024, the OAS responded that no archeological materials are likely to be encountered and that an archeological inspection or survey was not necessary; and

WHEREAS, pursuant to 36 C.F.R. § 800.6(a)(1) (2014), FAA notified the ACHP of the determination of adverse effect and intention to enter into a MOA with specified documentation on March 18, 2024, and the ACHP chose not to participate in the consultation pursuant to 36

C.F.R. § 800.6(a)(1)(iii) on March 27, 2024; and

WHEREAS, on March 20, 2024, the Osage Nation Historic Preservation Office responded to the FAA and requested additional information, and on June 4, 2024, the Osage Nation Historic Preservation Office requested a Phase I Archeological Survey of the project area; and

WHEREAS, the Phase I Archeological Survey was completed and the report was submitted to the Osage Nation Historic Preservation Office on September 24, 2024. The Osage Nation Historic Preservation office responded on November 14, 2024, indicating the proposed project will not adversely affect any sacred properties and/or properties of cultural significance; and

WHEREAS, the FAA held a meeting with consulting parties who responded with an interest in participating in the process (Don Nuzum and Rhonda Skrapke, City of Ponca City), consultants (Derek Blackshare, Blackshare Environmental Solutions; Tyler McDonald, LBR Airport Consultants; Dean Afendras, Afendras Archeology; Kathryn St. Clair and Victoria Sisco, Horizon Environmental Services), and the OHS and OAS (SHPO) on January 13, 2025, to discuss the project, the condition of the PNC Terminal Building and to present proposed mitigation measure options; and

WHEREAS, the FAA provided meeting notes and documentation of the January 13, 2025, meeting and responses to consulting parties' input, to the consulting parties and meeting attendees on January 14, 2025, and

WHEREAS, the City of Ponca City will have roles and responsibilities in the implementation of this MOA, and FAA invited the City of Ponca City to sign this MOA as an Invited Signatory; and

WHEREAS, the FAA has invited the consulting parties to each sign the MOA as a concurring party per FAA policy, however, none of the consulting parties responded with an interest to sign the MOA as concurring parties; and

WHEREAS, a Draft Environmental Assessment (EA) is being prepared to inform the public of the potential environmental, social, and economic impacts associated with the proposed PNC Terminal Building demolition and the No-Build and Rehabilitation Alternatives; and

NOW, THEREFORE, FAA, the City of Ponca City, and the SHPO agree that the Project shall be implemented in accordance with the following stipulations to consider the effect of the Project on historic properties, mitigating the adverse effect on historic properties, and satisfactorily completing FAA's Section 106 responsibilities under the NHPA.

STIPULATIONS

The FAA, in coordination with the City of Ponca City will ensure that the following stipulations are implemented and will be included as conditions for the demolition of the PNC Terminal Building.

I. Professional Qualification Standards

The City of Ponca City will ensure that all actions prescribed by this MOA are carried out by, or under the direct supervision of, qualified professional(s) who meet the appropriate standards in the applicable disciplines as outlined in the *Secretary of the Interior's Professional Qualifications Standards* (36 C.F.R. § 61).

II. Modified Historic American Building Survey Documentation of the PNC Terminal Building

A. The City of Ponca City will prepare documentation of the PNC Terminal Building to meet modified Historic American Building Survey (HABS) Level II standards. The HABS Level II standards are defined in the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation. Modified Level II documentation will include:

   1. Archival-quality prints of photographs documenting the PNC Terminal Building's present appearance and major structural or decorative details taken using large- format black and white film and processed following the National Park Service guidelines for prints and produced in accordance with the U.S. Copyright Act, as amended;

   2. Written report, including history and physical description, following the outline format for HABS Level II documentation;

   3. U.S. Geological Survey topographic map identifying the location of the PNC Terminal Building; and

   4. Include scanned high-resolution images of the original plans and elevations of the PNC Terminal Building, should these be located and obtained.

B. The City of Ponca City will submit a draft of the modified HABS Level II documentation to the OHS (SHPO). The SHPO will have 30 calendar days upon receipt to review and comment on a draft of the documentation. Failure by the SHPO to provide comments in accordance with this stipulation may be taken to indicate acceptance by both parties. The City of Ponca City will make a good-faith effort to address any comments provided by the SHPO.

C. Upon acceptance of the draft documentation by the SHPO, or determination by SHPO that the documentation is sufficient, demolition of the PNC Terminal Building may commence.

D. Within 45 days of the acceptance of the draft documentation by the SHPO, final documentation, including archival prints of photo documentation, will be provided to the SHPO by the City of Ponca City. Final print documentation will be printed on archival paper, and negatives will be provided to the SHPO. The City of Ponca City will provide digital files to the SHPO, and the City of Ponca City Historic Preservation Office.

E. The final documentation will not meet HABS Level II standards for formatting and is *not* to be submitted to the HABS Collection in the Library of Congress but will be housed in the OHS (SHPO) archives.

III. Interpretive Sign

To provide education information to the public upon completion of the PNC Terminal Building demolition and for its use within the newly proposed terminal building public space, the City of

Ponca City will design and install an interpretive sign detailing the history of the PNC Terminal Building as well as the history of the PNC Airport.

A. The City of Ponca City will develop the interpretive sign's content and design, in consultation with SHPO. The interpretive sign will include narrative historic context and historic photographs. The sign will be fabricated designed for interior usage.

B. The City of Ponca City will submit a draft design plan for the interpretive sign to SHPO. The draft design plan will include, but is not limited to, information on size, location, materials, design, and content of the interpretive sign. SHPO will have 30 calendar days to provide comments on the draft design plan. If SHPO does not provide comments within 30 calendar days, the City of Ponca City will assume concurrence and proceed according to the submitted plan.

C. The City of Ponca City will consult with SHPO to address comments provided in accordance with Stipulation IIIB and submit a final design plan for SHPO concurrence. SHPO will have 30 calendar days to accept or amend the final design plan.

D. The City of Ponca City will install the interpretive sign following construction of the new terminal building. Location of the display space to be determined by the City of Ponca City.

IV. Preparation of the City of Ponca City Website Information

To provide educational information to the public, the City of Ponca City will prepare a historic context for posting to the City of Ponca City website.

A. The historic context will discuss the development and history of the PNC and the construction and design of the PNC Terminal Building and serve as a digital story map.

V. Preparation of QR Code Describing History of PNC and the Terminal Building

For ease of access to data posted online as part of this MOA, the City of Ponca City will produce a graphical quick response (QR) code linking to the online data.

A. The QR code shall be prepared using commercially available software and provided on the interpretive sign and any print material related to the PNC Terminal Building.

B. The QR code shall be created once the City of Ponca City has established a permanent online location for digital data.

VI. Preparation of 3D Modeling on PNC Terminal Building for Posting to the City of Ponca City Website linked to QR Code and as Attachment to HABS Documentation

To provide the equivalent of architectural drawings of the PNC Terminal Building, 3D Modeling will be prepared and attached to the HABS Documentation package, as part of Stipulation II. The 3D Modeling will also be used by the City of Ponca City on their website (Stipulation V) and

attached to the QR Code (Stipulation VI).

A. Digital files of the modeling will be supplemented with a summary letter report. The digital files (each category may have multiple files) may consist of 1) a 3D object file (.obj) or alternative scaled to real-world dimensions; 2) a material and/or texture file (.mtl and/or .jpg); 3) optional original digital source photos (.jpg); and/or 4) optional Agisoft Metashape working file(s) (.psx) and/or archive file (.psx).

B. A summary report will be prepared by the City of Ponca City which will describe the images which were captured. The City of Ponca City will provide a thumb drive with the images to SHPO, and the City of Ponca City Historic Preservation Office.

C. The digital files will be made available on the City of Ponca City's website or equivalent for the general public to view, with links provided through their website and through the QR Code.

VII. Inadvertent Discoveries

In the event the Project will affect a previously unidentified property that may be eligible for inclusion in the NRHP, the City of Ponca City shall require work in the area of the discovery to cease until actions that will consider the effects of the Project on the property can be implemented. The City of Ponca City shall immediately notify FAA of the discovery and provide FAA with the information required to request the SHPO's comments pursuant to 36 CFR 800.11(b).

Letters requesting input and comment were sent to federally recognized Indian tribes on January 29, 2024. One response was received on November 14, 2024, from the Osage Nation stating no known effects to any cultural or historical sites are anticipated from the proposed project. No other responses were received from federally recognized Indian tribes.

If Native American human remains and/or objects subject to the provisions of the Native American Graves Protection and Repatriation Act (NAGPRA) [25 U.S.C. 3001 et seq.], i.e., burials, associated and unassociated funerary objects, sacred objects and objects of cultural patrimony, are encountered during the Project, the City of Ponca City shall immediately notify the FAA so that FAA can consult with the appropriate federally recognized Indian tribe(s) to determine appropriate treatment measures for these human remains in agreement with 36 CFR 800.13(b)(3) (2014). It shall be the responsibility of City of Ponca City to either preserve in place or repatriate these humans remains, depending on the agreed upon determination of the tribe(s). If remains / objects subject to NAGPRA are encountered prior to completion of the transfer, the rules of NAGPRA disposition will be followed by the City of Ponca City. Nothing in this agreement shall be construed to contradict this stipulation.

In the event of inadvertent discovery of archaeological materials not subject to NAGPRA, work shall immediately stop in the area of discovery and FAA shall comply with 36 CFR 800.13(b)(3) (2014) to notify and consult with the SHPO, federally recognized Indian tribes that might attach significance to the property, and the Advisory Council on Historic Preservation (ACHP).

VIII. Dispute Resolution

A. Should the signatories to this MOA object within 30 days to any plans or other documents provided by the City of Ponca City or others for review pursuant to this

agreement, or to any actions proposed or initiated by the City of Ponca City pursuant to this MOA, the City of Ponca City shall consult with the objecting party to resolve the objection. If the City of Ponca City determines that the objection cannot be resolved, the City of Ponca City shall forward all documentation relevant to the dispute to the FAA and to the ACHP. Within 30 days after receipt of all pertinent documentation, the ACHP will either:

1. Provide FAA with recommendations, which FAA will consider in reaching a final decision regarding the dispute; or

2. Notify FAA that it will comment pursuant to 36 CFR 800.7(a)(4) and proceed to comment; and

3. Any ACHP comment will be considered by FAA in accordance with 36 CFR 800.7 with reference to the subject of the dispute.

B. Any recommendations or comment provided by the ACHP will pertain only to the subject of the dispute; FAA's responsibility to carry out all other actions under this MOA that are not the subjects of the dispute will remain unchanged.

C. At any time during implementation of the measures stipulated in this MOA by FAA, if an objection to any such measure or its manner of implementation is raised by interested parties, then FAA shall consider the objection and consult, as appropriate, with the objecting party and the consulting parties to attempt to resolve the objection.

IX. Amendments

A. The signatories to this MOA may request that this MOA be revised, whereby the parties will consult to consider whether such revision is necessary, pursuant to 36 CFR 800.6(c)(7).

B. If it is determined that revisions to this MOA are necessary, then FAA and the signatories shall consult pursuant to 36 CFR Part 800.6, as appropriate, to make such revisions; except that, reviewing parties must comment on, or signify their acceptance of, the proposed changes to the MOA in writing within 30 days of their receipt.

X. Termination of Agreement

A. The signatories to this MOA may terminate this MOA by providing 30 days written notice to the other signatory parties, pursuant to 36 CFR 800.6(c)(8). During the period after notification and prior to termination, the City of Ponca City and the other signatories will consult to seek agreement on amendments or other actions that would avoid termination. In the event of termination, FAA will comply with 36 CFR 800.4 through 800.6 regarding individual undertakings.

B. The parties agree that this MOA will become null and void upon completion of all mitigative measures stipulated herein.

XI. Effective Date and Duration

A. The effective date of this MOA shall be the date of the last signature by a signatory. Unless amended in accordance with Stipulation XI or terminated in accordance with Stipulation XII, this MOA will remain in effect for 5 years. This MOA may be extended for an additional 5 years by a letter from the FAA with written concurrence from the SHPO and the City of Ponca City.

MEMORANDUM OF AGREEMENT
AMONG THE FEDERAL AVIATION ADMINISTRATION (FAA), PONCA CITY REGIONAL AIRPORT (PNC), AND THE OKLAHOMA STATE HISTORIC PRESERVATION OFFICER (SHPO), REGARDING THE PONCA CITY AIRPORT TERMINAL PROJECT, CITY OF PONCA CITY, KAY COUNTY, OKLAHOMA

Execution of this Memorandum of Agreement by the signatories consisting of the FAA, the City of Ponca City, and the SHPO, its subsequent filing with the ACHP, and implementation of its terms evidence that FAA has afforded the ACHP the opportunity to comment on the Project and that FAA has considered the effect of the Project on historic properties.

SIGNATORY PARTIES:

FEDERAL AVIATION ADMINISTRATION

By: _____ Date _____

Printed Name: _____

MEMORANDUM OF AGREEMENT
AMONG THE FEDERAL AVIATION ADMINISTRATION (FAA), PONCA CITY REGIONAL AIRPORT (PNC), AND THE OKLAHOMA STATE HISTORIC PRESERVATION OFFICER (SHPO), REGARDING THE PONCA CITY AIRPORT TERMINAL PROJECT, CITY OF PONCA CITY, KAY COUNTY, OKLAHOMA

Execution of this Memorandum of Agreement by the signatories consisting of the FAA, the City of Ponca City, and the SHPO, its subsequent filing with the ACHP, and implementation of its terms evidence that FAA has afforded the ACHP the opportunity to comment on the Project and that FAA has considered the effect of the Project on historic properties.

SIGNATORY PARTIES:

CITY OF PONCA CITY

By: _____ Date _____

Printed Name: _____

MEMORANDUM OF AGREEMENT
AMONG THE FEDERAL AVIATION ADMINISTRATION (FAA), PONCA CITY REGIONAL AIRPORT (PNC), AND THE OKLAHOMA STATE HISTORIC PRESERVATION OFFICER (SHPO), REGARDING THE PONCA CITY AIRPORT TERMINAL PROJECT, CITY OF PONCA CITY, KAY COUNTY, OKLAHOMA

Execution of this Memorandum of Agreement by the signatories consisting of the FAA, the City of Ponca City, and the SHPO, its subsequent filing with the ACHP, and implementation of its terms evidence that FAA has afforded the ACHP the opportunity to comment on the Project and that FAA has considered the effect of the Project on historic properties.

SIGNATORY PARTIES:

OKLAHOMA STATE HISTORIC PRESERVATION OFFICER

By: _____ Date _____

Printed Name: _____

Appendix C
Department of Interior Response

United States Department of the Interior
OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
301 Dinosaur Trail
Santa Fe, NM 87508

4111

February 12, 2026

IN REPLY REFER TO:
ER 26/0024

John MacFarlane
Federal Aviation Administration
10101 Hillwood Parkway
Fort Worth, TX 76177

Subject: Federal Aviation Administration Draft Individual Section 4(f) Evaluation for the Ponca City Regional Airport Terminal Replacement Project in Kay County, Oklahoma

Dear John MacFarlane,

The U.S. Department of the Interior (Department) has reviewed the Federal Aviation Administration's (FAA) Draft Individual Section 4(f) Evaluation to replace the existing terminal building at Ponca City Municipal Airport (PNC) in Ponca City, Oklahoma. The Department understands the purpose of the project is to provide PNC with a modern terminal building that would incorporate FAA airport design standards and recommendations. The project would permanently demolish the existing terminal building to allow construction for a new terminal building, apron expansion and new parking lot. The existing terminal building is eligible for listing on the National Register of Historic Places (NRHP) and qualifies under Section 4(f) of the U.S. Department of Transportation Act. The Draft Individual Section 4(f) Evaluation seeks to analyze impacts from replacing the existing terminal building.

Section 4(f) of the U.S. Department of Transportation Act specifies that the Secretary of Transportation may approve a transportation program or project requiring the use of Section 4(f) property only if there is no prudent and feasible alternative that avoids the Section 4(f) property and that the project includes all possible planning to minimize harm to the Section 4(f) property; or FAA makes a finding that the project has a de minimis impact on the Section 4(f) property. The FAA has determined permanently demolishing the NRHP-eligible structure is an "adverse effect" to the historic structure due to the change in character of the property's use, and this adverse effect constitutes a "use" of the Section 4(f) property beyond the de minimis use. The FAA has concluded that there were no feasible and prudent alternatives to the use of the existing terminal building.

The Department concurs with the FAA's Draft Individual Section 4(f) Evaluation that there are no prudent and feasible avoidance alternatives for Section 4(f) use of the historic property noted, and that the FAA has adequately planned to minimize harm to the Section 4(f) property. The

Department concurs that the proposed project would result in an adverse effect to the existing terminal building, and that this adverse effect results in a permanent physical "use" of the property beyond the de minimis use. Because the FAA, PNC, and the Oklahoma State Historic Preservation Office are entering into a Memorandum of Agreement in accordance with Section 106 of the National Historic Preservation Act, the Department has no objection to Section 4(f) approval of this project.

The Department appreciates the opportunity to review the Draft Individual Section 4(f) Evaluation. For matters related to the Department's Section 4(f) review, please coordinate with Deena Lentz, Regional Environmental Coordinator, National Park Service, Interior Regions 6, 7, and 8 at deena_lentz@nps.gov. If you have any questions for the Department or need assistance, please reach out to me via email at rebecca_collins@ios.doi.gov or by phone at (720) 814-6167.

Sincerely,

Rebecca Collins
Regional Environmental Officer
Office of Environmental Policy and Compliance

Electronic distribution: john.macfarlane@faa.gov

cc: Deena Lentz, deena_lentz@nps.gov
Melissa Stedeford, melissa_stedeford@nps.gov

Appendix D
ACHP Notification Package

Advisory Council on Historic Preservation
Electronic Section 106 Documentation Submittal System (e106) Form
MS Word format

Send to: *e106@achp.gov*

Please review the instructions at www.achp.gov/e106-email-form **prior to completing this form. Questions about whether to use the e106 form should be directed to the assigned ACHP staff member in the Office of Federal Agency Programs.**

I. Basic information

1. **Purpose of notification.** Indicate whether this documentation is to:
   - ☒ Notify the ACHP of a finding that an undertaking may adversely affect historic properties
   - ☐ Invite the ACHP to participate in a Section 106 consultation
   - ☐ Propose to develop a project Programmatic Agreement (project PA) for complex or multiple undertakings in accordance with 36 C.F.R. 800.14(b)(3)
   - ☐ Supply additional documentation for a case already entered into the ACHP record system
   - ☐ File an executed MOA or PA with the ACHP in accordance with 800.6(b)(iv) (where the ACHP did not participate in consultation)
   - ☐ Other, please describe
     Click here to enter text.

2. ACHP Project Number (If the ACHP was previously notified of the undertaking and an ACHP Project Number has been provided, enter project number here and skip to Item 7 below): N/A

3. **Name of federal agency** (If multiple agencies, list them all and indicate whether one is the lead agency):

   Federal Aviation Administration (FAA)

4. **Name of undertaking/project** (Include project/permit/application number if applicable):

   Ponca City Regional Airport (PNC) New Terminal Construction
   Oklahoma Historical Society (OHS) File #1277-23

5. **Location of undertaking** (Indicate city(s), county(s), state(s), land ownership, and whether it would occur on or affect historic properties located on tribal lands):

   2231 Waverly Street, Kay County, Ponca City, Oklahoma. Section 16, Township 26N, Range 2E. Land owned by the City of Ponca City.

6. **Name and title of federal agency official and contact person for this undertaking**, including email address and phone number:

Kelly Oliver-Amy, Environmental Protection Specialist, FAA
Kelly.M.Oliver-Amy@faa.gov
817-222-5645

II. Information on the Undertaking*

7. Describe the undertaking and nature of federal involvement (if multiple federal agencies are involved, specify involvement of each):

The FAA has received a proposal from Ponca City Regional Airport (PNC) for construction of a new terminal building and removal of the airport's current terminal building. The project would be partially funded with FAA grant funds. The issuance of grant funds is a Federal undertaking subject to compliance with Section 106 of the National Historic Preservation Act (NHPA).

The objective of the proposed project is to remove the existing terminal building and design and construct a new terminal building, west of the existing terminal. The current Ponca City Airport Terminal building was constructed in 1953. The new terminal building is intended to meet existing and future needs at PNC as well as increasing passenger/crew capacity.

8. Describe the Area of Potential Effects (APE):

The APE is considered the construction footprint and 100-feet around the current terminal building.

9. Describe steps taken to identify historic properties:

On March 29, 2023, FAA initiated coordination with the SHPO (Oklahoma Historical Society or OHS) seeking review of the project under Section 106 of the NHPA. The documentation was prepared by Secretary of the Interior qualified Cultural Resource Management professionals and presented to the SHPO stated that Ponca City Terminal building was constructed in 1953 and was recommended as eligible for listing in the National Register of Historic Places (NRHP) under Criterion A (Economics) and C (Architecture). Documentation included presenting the project APE of the proposed project area, which includes the Ponca City Airport Terminal building, and photographs showing the terminal building and the viewshed around the building. In addition, copies of historical and current aerial imagery, and Sanborn Fire Insurance Maps were included in the coordination with the SHPO (copies of this information supplied to the SHPO is included in the associated attachment).

For archeology, the Oklahoma Archeological Survey was contacted, and responded on May 1, 2023, indicating that no archeological sites are listed as occurring within the project area, and based on the topographic and hydrologic setting, no archaeological materials are likely to be encountered. Thus, an archaeological field inspection is not considered necessary and recommended that no further work was needed.

On Apil 25, 2023, the SHPO concurred with FAA's determination that the Ponca City Airport Terminal building was eligible for listing in the NRHP under Criteria A and C, and that the proposed project would have an adverse effect on the Ponca City Airport Terminal building. SHPO encouraged efforts to mitigate, minimize or eliminate the adverse effects. If adverse effects cannot be eliminated, then the SHPO requested notification by the FAA of their intent to negotiate the appropriate mitigation measures and enter into a Memorandum of Agreement (MOA), and that the FAA contact the ACHP. The SHPO commented on archaeology stating that no identified historic properties, archeological sites, or other cultural resources are present or affected. However, if cultural materials are encountered during project activities, work should cease in the immediate area; work can continue where no cultural materials are

present.

10. Describe the historic property (or properties) and any National Historic Landmarks within the APE (or attach documentation or provide specific link to this information):

Ponca City Airport Terminal is eligible for the National Register of Historic Places under Criterion A (Economics) and Criterion C (Architecture) at the local level of significance for its association with the post-World War II economic development of Ponca City. The period of significance is 1953, which corresponds to the building's construction.

The building was designed by William R. Brown, A.I.A. and constructed by the City of Ponca City, the Civil Aeronautics Administration and Robertson Construction Company. The terminal includes a popular Mexican restaurant, and the traffic control tower is atop of the two-story portion of the building. The original portion of the terminal has brick-clad walls. All windows are metal and fixed. The southern elevation of the lower and upper story has corner windows with metal supports. All but two of the glass security doors on the two-story portion of the north elevation are metal with full glass. The two security doors on the north elevation area metal with three windows. This area has a flat metal covering above the doors. The northeast elevation is a dining area for the restaurant, enclosed entirely by floor-to-ceiling glass windows and doors. The roof of the one-story portion is flat and composed of concrete, overhanging the walls by a few feet. The two-story portion with the control tower is also flat but has a low wall and metal railing around the edge. The level with the control tower is accessible from the one-story roof by an exterior metal ladder. The control tower consists of vertical walls above which are metal fixed windows on all facades. The lower wall is covered with protective sheeting. The west side of the control tower had a single metal door with a small window. The only decorative elements on the terminal are the metal words "Ponca City" mounted on the two-story portion of the east and west elevations, above the windows. The addition on the north side of the terminal has a concrete foundation with metal walls and a flat metal roof. A single metal slab door is on the east elevation and a single metal sliding window is on the north elevation.

11. Describe the undertaking's effects on historic properties:

The Project undertaking will have an adverse impact to the historic properties due to demolition of the resource.

Explain how this undertaking would adversely affect historic properties (include information on any conditions or future actions known to date to avoid, minimize, or mitigate adverse effects):

The removal of the existing 1953 Ponca City Airport Terminal building would adversely affect the building by directly diminishing the historical integrity of design, workmanship, materials, feeling, association and setting.

Mitigation efforts will be discussed with interested consulting parties in a meeting following the consulting party presentation and meeting scheduled for March 26, 2024.

13. Provide copies or summaries of the views provided to date by any consulting parties, Indian tribes or Native Hawai'ian organizations, or the public, including any correspondence from the SHPO and/or THPO.

No views were provided by tribal organizations or Native Hawaiian organizations for the project.

Views and responses from consulting parties will be collected and considered during the March 26, 2024

presentation and virtual meeting.

III. Additional Information

14. **Please indicate the status of any consultation that has occurred to date, including whether there are any unresolved concerns or issues the ACHP should know about in deciding whether to participate in consultation.** Providing a list of consulting parties, including email addresses and phone numbers if known, can facilitate the ACHP's review response.

Between January 26-January 29, 2023, letters sent via email or U.S. Postal Service/Certified Mail (when email addresses were not available) to the consulting parties and tribal organizations listed below. All letters were documented as having been received by all parties between January 29, 2024. As of today's date, responses have been received from three of the seven consulting parties. Below are two tables: Table 1 summarizes the tribal organizations contacted (some with two contact emails; thus, the duplication in organizations listed). Table 2 summarizes the consulting parties contacted, and responses received. All parties were contacted via email unless otherwise noted for the purpose of record-keeping.

On March 26, 2024, a presentation and meeting with the consulting parties who have expressed interest in the process will be held to discuss the project and to present potential mitigation measures for the terminal building. The parties invited include the Deputy SHPO and the OHS Section 106 Coordinator, the City of Ponca City representatives, a representative from FAA, a representative from the Ponca City Airport. In addition, environmental consultants involved with the project will be present.

Table 1: Tribal Organizations Invited to Consult

Organization	Phone	Email	Response
Apache Tribe of Oklahoma	(405) 247-9493	durell.cooper@apachetribe.org	Delivered: 1/29/2024 *No response*
Apache Tribe of Oklahoma	(405) 247-9493	bkomardley@outlook.com	Delivered: 1/29/2024 *No response*
Cherokee Nation Cheyenne and Arapaho Tribes, Oklahoma	(918) 453-5389	elizabeth-toombs@cherokee.org	Delivered: 1/29/2024 *No response*
Cheyenne and Arapaho Tribes, Oklahoma	405-422-7714	mbear@cheyenneandarapaho-nsn.gov	Delivered: 1/29/2024 *No response*
Kaw Nation, Oklahoma	(800) 247-4612	rwassana@c-a-tribes.org	Delivered: 1/29/2024 *No response*
Osage Nation	(580) 269-2552	kjenkins@kawnation.com	Delivered: 1/29/2024 *No response*
Tonkawa Tribe of Indians of Oklahoma	(918) 287-5328	s106@osagenation-nsn.gov	Delivered: 1/29/2024 *No response*
Tonkawa Tribe of Indians	(580) 628-2561	rmartin@tonkawatribe.com	Delivered:

of Oklahoma			1/29/2024 *No response*
Wichita and Affiliated Tribes (Wichita, Keechi, Waco & Tawakonie), Oklahoma	(580) 628-7027	lbrown@tonkawatribe.com	Delivered: 1/29/2024 *No response*
Wichita and Affiliated Tribes (Wichita, Keechi, Waco & Tawakonie), Oklahoma	(405) 247-8695 ext. 200	gary.mcadams@wichitatribe.com	Delivered: 1/29/2024 *No response*

Table 2: Consulting Parties Invited to Consult

Organization	Phone	Email/Address	Response
OK Archeological Survey (OAS) Dr. Kary Stackelbeck	405-325-7211	oascap@ou.edu	Delivered: 1/30/2024; Response: 2/2/2024 *No archeological concerns: deferred consultation to OHS*
SHPO/OHS Deputy SHPO: Lynda Ozan	405-522-4484	Lynda.ozan@history.ok.gov	Delivered: 1/29/2024 Response: 2/7/2024 *Will continue to consult with FAA on the project*
Anthony Maeve, AIA Eastern Oklahoma Chapter	918-583-5300	Beck Design 110 West 7th Street, Ste 710, Tulsa, OK 74119	Delivered via US Postal Service, Certified Mail 1/29/2024; received 1/31/2024 *No response*
AIA Central OK Chapter	n/a	melissa@aiacoc.org	Delivered: 1/29/2024 *No response*
Don Nuzum Ponca City Regional Airport	580-767-0470	airport@poncacityok.gov	Delivered 1/29/2024 *Participating in consultation*
Ponca Historic Preservation	580-767-0339	grants@poncacity.ok.org	Delivered 1/29/2024 *No response*
Preservation Oklahoma	n/a	Tori.l.raines@gmail.com	Delivered 1/29/2024 *No response*

15 Does your agency have a website or website link where the interested public can find out about this project and/or provide comments? Please provide relevant links:

No website or website link is available.

16. Is this undertaking considered a "major" or "covered" project listed on the Federal Infrastructure Projects Permitting Dashboard? If so, please provide the link:

The Ponca City Terminal building replacement project is not a major undertaking, however, the Environmental Assessment will be listed on the Permitting Dashboard for Federal Infrastructure Projects because of a 2016 Secretary of Transportation memorandum stating that all Department of Transportation (DOT) Operating Administrations shall use the Dashboard to track projects covered by Environmental Assessments and Environmental Impact Statements.

The following are attached to this form (check all that apply):

- ☒ Section 106 consultation correspondence
- ☒ Maps, photographs, drawings, and/or plans
- ☐ Additional historic property information
- ☐ Consulting party list with known contact information
- ☐ Other: Click here to enter text.

See attachment 5 in 4(f) report

March 27, 2024

Kelly Oliver-Amy
Environmental Protection Specialist
Federal Aviation Administration

Ref: *Ponca City Regional Airport New Terminal Construction*
Ponca City, Kay County, Oklahoma
ACHP Project Number: 020691

Dear Ms. Oliver-Amy:

On March 18, 2024, the Advisory Council on Historic Preservation (ACHP) received your notification and supporting documentation regarding the potential adverse effects of the referenced undertaking on a property or properties listed or eligible for listing in the National Register of Historic Places. Based upon the information you provided, we have concluded that Appendix A, *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, of our regulations, "Protection of Historic Properties" (36 CFR Part 800) implementing Section 106 of the National Historic Preservation Act, does not apply to this undertaking. Accordingly, we do not believe our participation in the consultation to resolve adverse effects is needed.

However, if we receive a request for participation from the State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officer, affected Indian tribe, a consulting party, or other party, we may reconsider this decision. Should the undertaking's circumstances change, consulting parties cannot come to consensus, or you need further advisory assistance to conclude the consultation process, please contact us.

Pursuant to Section 800.6(b)(1)(iv), you will need to file the final Section 106 agreement document (Agreement), developed in consultation with the Oklahoma SHPO and any other consulting parties, and related documentation with the ACHP at the conclusion of the consultation process. The filing of the Agreement and supporting documentation with the ACHP is required in order to complete the requirements of Section 106 of the National Historic Preservation Act.

Thank you for providing us with your notification of adverse effect. If you have any questions or require our further assistance, please contact Max Sickler at (202) 517-0220 or by e-mail at msickler@achp.gov and reference the ACHP Project Number above.

Sincerely,

Dana Daniels
Historic Preservation Technician
Office of Federal Agency Programs

Appendix E
Consulting Party Meeting Agenda and Notes

Ponca City Airport Terminal (PNC)

Consulting Party Meeting Agenda
January 13, 2025
1:00 CST

I. Welcome/Introductions

- Purpose of the Call: Provide information on the demolition of the Ponca City Terminal Building and provide an opportunity for discussion and feedback from consulting parties

II. Purpose and Need of the Project: ***Derek Blackshare, P.E.; Blackshare Environmental Solutions***

- Purpose: Meet current FAA design standards, betterment of safety, efficiency, and capacity
- Need: The current terminal is outdated and inefficient for security, infrastructure, and technology. It was also constructed in such a way that it obstructs the FAA Part 77 Transitional Surface (from the runway)

III. Project Background

- History of the Ponca City Airport Terminal

IV. Applicable Regulatory Statutes

- NEPA
- Section 4(f) of the DOT Act
- Section 106 of the NHPA

V. Alternatives Considered to Address the Purpose and Need: ***Tyler McDonald, LBR Inc***.

- Alternative A: No Action – current terminal continues in use
- Alternative B: Proposed Action – demolish current terminal, build larger and updated terminal, construct a new parking lot, and make apron improvements on the east side of the terminal.

VI. Coordination and Communication Completed to Date

- SHPO: Cultural Resource Survey Report and Effects Determination
- THPO: Coordination and Osage Nation data request and response
- ACHP: Coordination and Participation Decline
- State and Community Interest Organizations

VII. Regulatory Process Timeline (Section 106 NHPA and Section 4(f) DOT Act)

- Review Completed Steps and Next Steps

VIII. Potential Mitigation Options

- Historic American Building Survey (HABS)
- Interpretive Signage
- QR Code with Information on the Terminal Building
- Weblink with Information on the City of Ponca City Website
- Drone and Lidar Imagery Documentation (building tour)
- Retention of Signage and/or other features
- Other

IX. Discussion/Questions

X. Action Items

Horizon™
Environmental Services

Meeting Notes

Date: 01/13/2025 at 1:00 CT; Virtual via Teams

Project: Ponca City Airport Terminal (PNC)

Participants: Don Nuzum; Kelly Oliver-Amy, John MacFarlane; Derek Blackshare; Tyler McDonald; Dean Afendras; Breanne Gonzales Jackson; Sara Werneke; Kristina Wyckoff, Rhonda Skrapke; Kathryn St. Clair and Victoria Sisco.

RE: Consulting Parties Meeting

I. Welcome/Introductions

Kathryn St. Clair (Horizon Environmental) opened the call by welcoming participants and invited Kelly Oliver-Amy to introduce the meeting topic. Kelly provided an overview of the project and outlined the purpose of the call, which was to share information regarding the demolition of the Ponca City Airport Terminal and to facilitate discussion and feedback from the consulting parties. Following this, all participants introduced themselves. Kathryn St. Clair (Horizon) then presented a brief summary of the meeting agenda.

II. Purpose and Need of the Project

Derek Blackshare (Blackshare Environmental) presented the purpose and need for the project, highlighting the following key points:

- **Addressing the Need**: The existing terminal, constructed in 1952, is inadequate in terms of infrastructure and technology to meet current operational demands.
- **Regulatory Compliance**: The current terminal is in violation of Part 77 of FAA regulations due to encroachment and visual intrusions.
- **Compliance with FAA Standards**: The proposed new terminal will meet FAA regulations, specifically Part 77, as the existing terminal obstructs aircraft approach visibility. Additionally, it will address the outdated infrastructure and technology of the current facility.
- **Project Purpose**: The primary purpose of this project is to address these issues and fulfill the identified needs.

III. Project Background

Kathryn St. Clair presented the historical background of the Ponca City Airport Terminal, noting the following key points:

- The airport complex was established in 1930 to serve as a training facility for the British and U.S. forces.
- Construction of the terminal was completed in 1952-1953, reflecting the modernist movement in its architectural design.

- The State Historic Preservation Office (SHPO) has determined that the terminal meets Criterion A for its representation of economic development in Ponca City, as well as Criterion C for its architectural significance.

IV. Applicable Regulatory Statutes

Kathryn St. Clair provided an overview of the regulatory statutes applicable to the project, which include:

- **The National Environmental Policy Act (NEPA):** NEPA requires federal agencies to assess the environmental effects of their proposed actions before making decisions. It aims to ensure that environmental factors are considered in decision-making processes.
- **Section 4(f) of the Department of Transportation (DOT) Act:** Section 4(f) prohibits the use of publicly owned land, including parks, recreation areas, wildlife refuges, and historic sites, for transportation projects unless there is no feasible and prudent alternative.
- **Section 106 of the National Historic Preservation Act (NHPA):** Section 106 requires federal agencies to consider the effects of their undertakings on historic properties. This process ensures that significant historic sites are protected and preserved during the development of federal projects.

V. Alternatives Considered to Address the Purpose and Need:

Tyler McDonald (LBR Inc.) presented the alternatives considered to address the safety concerns at the terminal, as outlined below:

- **Alternative A: No Action** – The existing terminal would remain in operation without any changes.
- **Alternative B: Proposed Action** – The existing terminal would be demolished and replaced with a larger, updated facility. This alternative also includes the construction of a new parking lot and improvements to the apron on the east side of the terminal.

Tyler McDonald (LBR Inc.) presented the proposed design for the new terminal using 3D models and site maps. He highlighted that the historically significant Greenwood hangar would not be demolished, but rather integrated into the new terminal's design. The proposed terminal would be relocated 350 feet from its current position. Additionally, the plan includes an increase in customer parking spaces from 100 to 140. The new terminal design also accommodates a restaurant within the facility, with logistics for the restaurant operations provided as part of the presentation.

VI. Coordination and Communication Completed to Date

Kathryn St. Clair outlined the process the project has undergone to date, as well as the next steps in the project timeline:

- **SHPO**: Completion of the Cultural Resource Survey Report and Effects Determination.
- **THPO**: Coordination with Tribal Organizations. The Osage Nation requested an archeological survey, which was provided. They reviewed it and determined no adverse effects on cultural resources. No other organizations responded.
- **ACHP**: Coordination with the Advisory Council on Historic Preservation via their electronic form; they declined to participate at this time.
- **State and Community Interest Organizations**: Invited organizations to participate in the consultation process.

Consulting Party: John MacFarlane (FAA)

Comment:
Mr. MacFarlane (FAA) emphasized that the general public is allowed to comment on the report (EA, MOA and Section 4(f) documentation prior to the finalization of all documents.

Response:
Kathryn Stclair acknowledged his input and confirmed that this suggestion would be implemented moving forward.

VII. Potential Mitigation Options

Kathryn St. Clair presented the following mitigation options for consideration:

- Historic American Building Survey (HABS) Level II
- Interpretive Signage
- QR Code providing Information on the Terminal Building
- Weblink with Information on the City of Ponca City Website
- Drone and Lidar Imagery Documentation (including a building tour)
- Retention of Signage and/or other distinctive features
- Additional Mitigation Measures

VIII. Discussion/Questions

Consulting Party: Sara Werneke (SHPO/Oklahoma Historical Society [OHS])

Comment: Ms. Werneke inquired whether a discussion had taken place regarding the option of rehabilitating the existing terminal, as opposed to demolishing it and constructing a new one.

Response: Tyler McDonald explained that discussions took place between Ponca City, the city's engineer, and the architect. However, it was determined that numerous features of the existing terminal are outdated, making rehabilitation more costly than constructing a new terminal.

Consulting Party: Sara Werneke

Comment: Ms. Werneke emphasized the importance of including all discussions in the mitigation list of alternatives. This ensures that both the work and the topics discussed are documented in writing.

Response: Kristina Wyckoff (SHPO/OHS) and Kelly Oliver-Amy (FAA) concur that the rehabilitation option is not feasible and should be documented as an alternative in the alternative analysis under Section 4(f) and NEPA.

Consulting Party: Sara Werneke

Comment: Ms. Werneke expressed her dissatisfaction with the HABS option for project mitigation, stating that it was insufficient. She proposed utilizing a Story Map as an alternative approach. Additionally, she suggested installing a display within the new terminal to serve as a physical tribute to the old terminal, preserving its historical significance. While she appreciated the architectural style of the new terminal and its homage to the adjacent hangar, she noted that the two structures originate from different eras and, as a result, do not align aesthetically.

Response: Kathryn St. Clair inquired into HABS being insufficient.

Consulting Party: Sara Werneke

Comment: Ms. Werneke further acknowledged that HABS is a valuable digital tool for public use. However, she emphasized her desire to see a physical tribute to the old terminal, rather than relying solely on a digital archive. She expressed the importance of making this physical tribute accessible and easily understandable for the public.

Response: Rhonda Skrapke (City of Ponca City) suggested the creation of a "coffee table book" featuring the old terminal, providing guests with an opportunity to review and read about its history.

Consulting Party: Sara Werneke

Comment: Ms. Werneke stated that as much information as possible should be made accessible to the public and noted that digital Story Maps serve as the modern equivalent of "coffee table books."

Consulting Party: Rhonda Skrapke

Comment: Ms. Skrapke recommended the installation of interpretive panels in the historic hangar to incorporate its history into the renovation.

Consulting Party: Kristina Wyckoff

Comment: Ms. Wyckoff proposed combining a physical representation of the old terminal, such as a book, with a digital archive to preserve and memorialize its history.

Response: Rhonda Skrapke agreed with Ms. Wyckoff's statement.

Consulting Party: John MacFarlane (FAA)

Comment: Mr. MacFarlane proposed a modified HABS Level Two approach, incorporating a kiosk or interpretive signage inside the new terminal. Given the new terminal's design, which includes walls of windows, he recommended positioning the kiosks or signage to face the location of the old terminal, allowing viewers to better understand the original placement of the structures.

Response: Sara Werneke voiced her agreement with Mr. MacFarlane's statement.

Consulting Party: Sara Werneke

Comment: Ms. Werneke inquired with Kristina Wyckoff regarding whether this project would require a HABS Level Two.

Response: Kristina Wyckoff agreed with Ms. Werneke's question.

Participant: Kathryn St. Clair

Comment: Ms. St. Clair inquired with Kristina Wyckoff about the filing of HABS in the project process and requested further elaboration.

Response: Kristina Wyckoff stated that the OK SHPO office serves as a repository for the Oklahoma Archives and is affiliated with the Smithsonian Institution.

Participant: Kathryn St. Clair

Comment: Ms. St. Clair inquired whether the documents are reviewed for compliance with DOI requirements.

Response: Sara Werneke confirmed that it is.

Kathryn Stclair reviewed the panel's notes and comments before concluding the discussion. She outlined the next steps in drafting the Memoranda of Agreement (MOA). Ms. St. Clair inquired if Kristina Wyckoff could provide example documents for review, to which Ms. Wyckoff shared a link in the meeting's dialogue box, along with the SHPO Agency agreements.

Ms. St. Clair closed the meeting by thanking all participants for their time and contributions, and informed the group that the meeting notes would be distributed. Additionally, the draft MOA would be circulated to the FAA, Consulting Parties, and the public for comments.

Appendix F
Memorandum of Agreement

MEMORANDUM OF AGREEMENT
AMONG THE FEDERAL AVIATION ADMINISTRATION (FAA), PONCA CITY REGIONAL AIRPORT (PNC), AND THE OKLAHOMA STATE HISTORIC PRESERVATION OFFICER (SHPO), REGARDING THE PONCA CITY AIRPORT TERMINAL PROJECT, CITY OF PONCA CITY, KAY COUNTY, OKLAHOMA

WHEREAS, the City of Ponca City, acting through its Ponca City Regional Airport (PNC), is proposing to construct a new terminal building and demolish the existing Terminal Building (Attachment A: Project Description); and

WHEREAS, the proposed PNC Terminal Replacement Project (the Project) traverses through the county of Kay (Attachment B: Location Map); and

WHEREAS, an engineering assessment of the PNC Terminal indicates that the existing terminal, constructed in 1953, obstructs aircraft approach visibility in conflict with FAA standards, is inadequate in terms of infrastructure and technology to meet current operational demands; and

WHEREAS, the Project is an undertaking as defined in 36 C.F.R. § 800.16 (2025) subject to review under Section 106 of the National Historic Preservation Act [54 U.S.C. § 306108 (2014)] (NHPA) and its implementing regulations at 36 C.F.R. § 800 (2014), and the Federal Aviation Administration (FAA) and PNC have consulted with the Oklahoma Archeological Survey (OAS) and Oklahoma Historical Society (OHS) acting as the State Historic Preservation Officer (SHPO), and federally-recognized tribal organizations to consider the effects of the undertaking on historic properties; and

WHEREAS, the FAA submitted a Request for SHPO (OHS and OAS) Coordination on March 29, 2023 describing the proposed demolition of the PNC Terminal and recommended the building as eligible for listing in the National Register of Historic Places (NRHP); and

WHEREAS, in a letter dated April 25, 2023, the SHPO responded concurring that the PNC Terminal is eligible for listing in the NRHP and responded that if demolition of the PNC Terminal cannot be prevented, then the project would have adverse effects on the PNC Terminal and appropriate mitigation measures are to be prepared and the FAA will need to enter into a Memorandum of Agreement (MOA) to resolve adverse effects pursuant to 36 C.F.R. § 800.6(c) (2014), which will govern the implementation of the undertaking and satisfy FAA's obligation to comply with Section 106; and

WHEREAS, in consultation with the SHPO and the City of Ponca City, the FAA prepared a list of tribal organizations and consulting parties to notify of the Project. In a letter dated January 29, 2024, the FAA notified federally recognized tribal organizations and consulting parties of the proposed Project, and invited parties to participate in the consultation process; and

WHEREAS, in a letter dated February 2, 2024, the OAS responded that no archeological materials are likely to be encountered and that an archeological inspection or survey was not necessary; and

WHEREAS, pursuant to 36 C.F.R. § 800.6(a)(1) (2014), FAA notified the Advisory Council on Historic Preservation (ACHP) of the determination of adverse effect and intention to enter into a MOA with specified documentation on March 18, 2024, and the ACHP chose not to participate

in the consultation pursuant to 36 C.F.R. § 800.6(a)(1)(iii) on March 27, 2024; and

WHEREAS, on March 20, 2024, the Osage Nation Historic Preservation Office responded to the FAA and requested additional information, and on June 4, 2024, the Osage Nation Historic Preservation Office requested a Phase I Archeological Survey of the project area; and

WHEREAS, the Phase I Archeological Survey was completed and the report was submitted to the Osage Nation Historic Preservation Office on September 24, 2024. The Osage Nation Historic Preservation office responded on November 14, 2024, indicating the proposed project will not adversely affect any sacred properties and/or properties of cultural significance; and

WHEREAS, the FAA held a meeting with consulting parties who responded with an interest in participating in the process (Don Nuzum and Rhonda Skrapke, City of Ponca City), consultants (Derek Blackshare, Blackshare Environmental Solutions; Tyler McDonald, LBR Airport Consultants; Dean Afendras, Afendras Archeology; Kathryn St. Clair and Victoria Sisco, Horizon Environmental Services), and the OHS and OAS (SHPO) on January 13, 2025, to discuss the project, the condition of the PNC Terminal Building and to present proposed mitigation measure options; and

WHEREAS, the FAA provided meeting notes and documentation of the January 13, 2025, meeting and responses to consulting parties' input, to the consulting parties and meeting attendees on January 14, 2025, and

WHEREAS, the City of Ponca City will have roles and responsibilities in the implementation of this MOA, and FAA invited the City of Ponca City to sign this MOA as an Invited Signatory; and

WHEREAS, the FAA has invited the consulting parties to each sign the MOA as a concurring party per FAA policy, however, none of the consulting parties responded with an interest to sign the MOA as concurring parties; and

WHEREAS, a Draft Environmental Assessment (EA) is being prepared to inform the public of the potential environmental, social, and economic impacts associated with the proposed PNC Terminal Building demolition and the No-Build and Rehabilitation Alternatives; and

NOW, THEREFORE, FAA, the City of Ponca City, and the SHPO agree that the Project shall be implemented in accordance with the following stipulations to consider the effect of the Project on historic properties, mitigating the adverse effect on historic properties, and satisfactorily completing FAA's Section 106 responsibilities under the NHPA.

STIPULATIONS

The FAA, in coordination with the City of Ponca City will ensure that the following stipulations are implemented and will be included as conditions for the demolition of the PNC Terminal Building.

I. Professional Qualification Standards

The City of Ponca City will ensure that all actions prescribed by this MOA are carried out by, or under the direct supervision of, qualified professional(s) who meet the appropriate standards in the applicable disciplines as outlined in the *Secretary of the Interior's Professional Qualifications Standards* (36 C.F.R. § 61).

II. Modified Historic American Building Survey Documentation of the PNC Terminal Building

A. The City of Ponca City will prepare documentation of the PNC Terminal Building to meet modified Historic American Building Survey (HABS) Level II standards. The HABS Level II standards are defined in the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation. Modified Level II documentation will include:

1. Archival-quality prints of photographs documenting the PNC Terminal Building's present appearance and major structural or decorative details using large-format black and white film and processed following the National Park Service guidelines for prints and produced in accordance with the U.S. Copyright Act, as amended;

2. Written report, including history and physical description, following the outline format for HABS Level II documentation;

3. U.S. Geological Survey topographic map identifying the location of the PNC Terminal Building; and

4. Include scanned high-resolution images of the original plans and elevations of the PNC Terminal Building, should these be located and obtained.

B. The City of Ponca City will submit a draft of the modified HABS Level II documentation to the OHS (SHPO). The SHPO will have 30 calendar days upon receipt to review and comment on a draft of the documentation. Failure by the SHPO to provide comments in accordance with this stipulation may be taken to indicate acceptance by both parties. The City of Ponca City will make a good-faith effort to address any comments provided by the SHPO.

C. Upon acceptance of the draft documentation by the SHPO, or determination by SHPO that the documentation is sufficient, demolition of the PNC Terminal Building may commence.

D. Within 45 days of the acceptance of the draft documentation by the SHPO, final documentation, including archival prints of photo documentation, will be provided to the SHPO by the City of Ponca City. Final print documentation will be printed on archival paper, and negatives will be provided to the SHPO. The City of Ponca City will provide digital files to the SHPO, and the City of Ponca City Historic Preservation Office.

E. The final documentation will not meet HABS Level II standards for formatting and is *not* to be submitted to the HABS Collection in the Library of Congress but will be housed in the OHS (SHPO) archives.

III. Interpretive Sign

To provide education information to the public upon completion of the PNC Terminal Building demolition and for its use within the newly proposed terminal building public space, the City of

Ponca City will design and install an interpretive sign detailing the history of the PNC Terminal Building as well as the history of the PNC Airport.

A. The City of Ponca City will develop the interpretive sign's content and design, in consultation with SHPO. The interpretive sign will include narrative historic context and historic photographs. The sign will be fabricated and designed for installation within the new terminal building.

B. The City of Ponca City will submit a draft design plan for the interpretive sign to SHPO. The draft design plan will include, but is not limited to, information on size, location, materials, design, and content of the interpretive sign. SHPO will have 30 calendar days to provide comments on the draft design plan. If SHPO does not provide comments within 30 calendar days, the City of Ponca City will assume concurrence and proceed according to the submitted plan.

C. The City of Ponca City will consult with SHPO to address comments provided in accordance with Stipulation IIIB and submit a final design plan for SHPO concurrence. SHPO will have 30 calendar days to accept or amend the final design plan.

D. The City of Ponca City will install the interpretive sign following construction of the new terminal building. Location of the display space to be determined by the City of Ponca City.

IV. Preparation of the City of Ponca City Website Information

To provide educational information to the public, the City of Ponca City will prepare a historic context for posting to the City of Ponca City website.

A. The historic context will discuss the development and history of the PNC Airport and the construction and design of the PNC Terminal Building and serve as a digital story map.

V. Inadvertent Discoveries

In the event the Project will affect a previously unidentified property that may be eligible for inclusion in the NRHP, the City of Ponca City shall require work in the area of the discovery to cease until actions that will consider the effects of the Project on the property can be implemented. The City of Ponca City shall immediately notify FAA of the discovery and provide FAA with the information required to request the SHPO's comments pursuant to 36 CFR 800.11(b).

Letters requesting input and comment were sent to federally recognized tribes on January 29, 2024. One response was received on November 14, 2024, from the Osage Nation stating no known effects to any cultural or historical sites are anticipated from the proposed project. No other responses were received from federally recognized Indian tribes.

If Native American human remains and/or objects subject to the provisions of the Native American Graves Protection and Repatriation Act (NAGPRA) [25 U.S.C. 3001 et seq.], i.e., burials, associated and unassociated funerary objects, sacred objects and objects of cultural patrimony, are encountered during the Project, the City of Ponca City shall immediately notify

the FAA so that FAA can consult with the appropriate federally recognized tribe(s) to determine appropriate treatment measures for these human remains in agreement with 36 CFR 800.13(b)(3) (2014). It shall be the responsibility of City of Ponca City to either preserve in place or repatriate these humans remains, depending on the agreed upon determination of the tribe(s). If remains / objects subject to NAGPRA are encountered prior to completion of the transfer, the rules of NAGPRA disposition will be followed by the City of Ponca City. Nothing in this agreement shall be construed to contradict this stipulation.

In the event of inadvertent discovery of archaeological materials not subject to NAGPRA, work shall immediately stop in the area of discovery and FAA shall comply with 36 CFR 800.13(b)(3) (2014) to notify and consult with the SHPO, federally recognized Indian tribes that might attach significance to the property, and the Advisory Council on Historic Preservation (ACHP).

VI. Dispute Resolution

A. Should the signatories to this MOA object within 30 days to any plans or other documents provided by the City of Ponca City or others for review pursuant to this agreement, or to any actions proposed or initiated by the City of Ponca City pursuant to this MOA, the City of Ponca City shall consult with the objecting party to resolve the objection. If the City of Ponca City determines that the objection cannot be resolved, the City of Ponca City shall forward all documentation relevant to the dispute to the FAA and to the ACHP. Within 30 days after receipt of all pertinent documentation, the ACHP will either:

    1. Provide FAA with recommendations, which FAA will consider in reaching a final decision regarding the dispute; or

    2. Notify FAA that it will comment pursuant to 36 CFR 800.7(a)(4) and proceed to comment; and

    3. Any ACHP comment will be considered by FAA in accordance with 36 CFR 800.7 with reference to the subject of the dispute.

B. Any recommendations or comment provided by the ACHP will pertain only to the subject of the dispute; FAA's responsibility to carry out all other actions under this MOA that are not the subjects of the dispute will remain unchanged.

C. At any time during implementation of the measures stipulated in this MOA by FAA, if an objection to any such measure or its manner of implementation is raised by interested parties, then FAA shall consider the objection and consult, as appropriate, with the objecting party and the consulting parties to attempt to resolve the objection.

VII. Amendments

A. The signatories to this MOA may request that this MOA be revised, whereby the parties will consult to consider whether such revision is necessary, pursuant to 36 CFR 800.6(c)(7).

B. If it is determined that revisions to this MOA are necessary, then FAA and the signatories shall consult pursuant to 36 CFR Part 800.6, as appropriate, to make such revisions; except that, reviewing parties must comment on, or signify their

acceptance of, the proposed changes to the MOA in writing within 30 days of their receipt.

VIII. Termination of Agreement

A. The signatories to this MOA may terminate this MOA by providing 30 days written notice to the other signatory parties, pursuant to 36 CFR 800.6(c)(8). During the period after notification and prior to termination, the City of Ponca City and the other signatories will consult to seek agreement on amendments or other actions that would avoid termination. In the event of termination, FAA will comply with 36 CFR 800.4 through 800.6 regarding individual undertakings.

B. The parties agree that this MOA will become null and void upon completion of all mitigative measures stipulated herein.

IX. Effective Date and Duration

A. The effective date of this MOA shall be the date of the last signature by a signatory. Unless amended in accordance with Stipulation XI or terminated in accordance with Stipulation XII, this MOA will remain in effect for 5 years. This MOA may be extended for an additional 5 years by a letter from the FAA with written concurrence from the SHPO and the City of Ponca City.

MEMORANDUM OF AGREEMENT
AMONG THE FEDERAL AVIATION ADMINISTRATION (FAA), PONCA CITY REGIONAL AIRPORT (PNC), AND THE OKLAHOMA STATE HISTORIC PRESERVATION OFFICER (SHPO), REGARDING THE PONCA CITY AIRPORT TERMINAL PROJECT, CITY OF PONCA CITY, KAY COUNTY, OKLAHOMA

Execution of this Memorandum of Agreement by the signatories consisting of the FAA, the City of Ponca City, and the SHPO, its subsequent filing with the ACHP, and implementation of its terms evidence that FAA has afforded the ACHP the opportunity to comment on the Project and that FAA has considered the effect of the Project on historic properties.

SIGNATORY PARTIES:

FEDERAL AVIATION

ADMINISTRATION By: _____ Date 3/17/2026

Printed Name: Heidi M. Higginbotham - Assistant Manager (Acting) AR/OK ADO

MEMORANDUM OF AGREEMENT
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SIGNATORY PARTIES:

CITY OF PONCA CITY

By: Don Nuzum Date 3/16/2026

Printed Name: Don Nuzum

MEMORANDUM OF AGREEMENT
AMONG THE FEDERAL AVIATION ADMINISTRATION (FAA), PONCA CITY REGIONAL AIRPORT (PNC), AND THE OKLAHOMA STATE HISTORIC PRESERVATION OFFICER (SHPO), REGARDING THE PONCA CITY AIRPORT TERMINAL PROJECT, CITY OF PONCA CITY, KAY COUNTY, OKLAHOMA

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SIGNATORY PARTIES:

OKLAHOMA STATE HISTORIC PRESERVATION OFFICER

By: _____ Date 3/10/26

Printed Name: Trait Thompson

Attachment A
Project Description

Project Description

The FAA received a proposal from Ponca City Regional Airport (PNC) for construction of a new terminal building and removal of the airport's current terminal building. The PNC is located at 2231 Waverly Street, Kay County, Ponca City, Oklahoma, on land owned by the City of Ponca City. The objective of the proposed project is to construct a new terminal building, 350 feet west of the existing terminal building, and remove the existing terminal building. The current Ponca City Airport Terminal building was constructed in 1953. The new terminal building is intended to comply with FCC airport standards, correct an encroachment of FAA airspace, add passenger and crew capacity, be more efficient, and improve security and technology.

The existing terminal would be demolished and replaced with a larger, updated facility. The proposed project also includes the construction of a new parking lot on the west side of the new terminal and improvements to the apron on the east side of the new terminal. Additional parking capacity will be added. The new terminal design also accommodates a restaurant within the facility, with logistics for the restaurant operations provided as part of the presentation.

The project would be partially funded with FAA grant funds. The issuance of grant funds is a Federal undertaking subject to compliance with Section 106 of the National Historic Preservation Act (NHPA). The Ponca City Airport Terminal is eligible for the National Register of Historic Places under Criterion A (Economics) and Criterion C (Architecture) at the local level of significance for its association with the post-World War II economic development of Ponca City. The period of significance is 1953, which corresponds to the building's construction.

Attachment B
Location Map

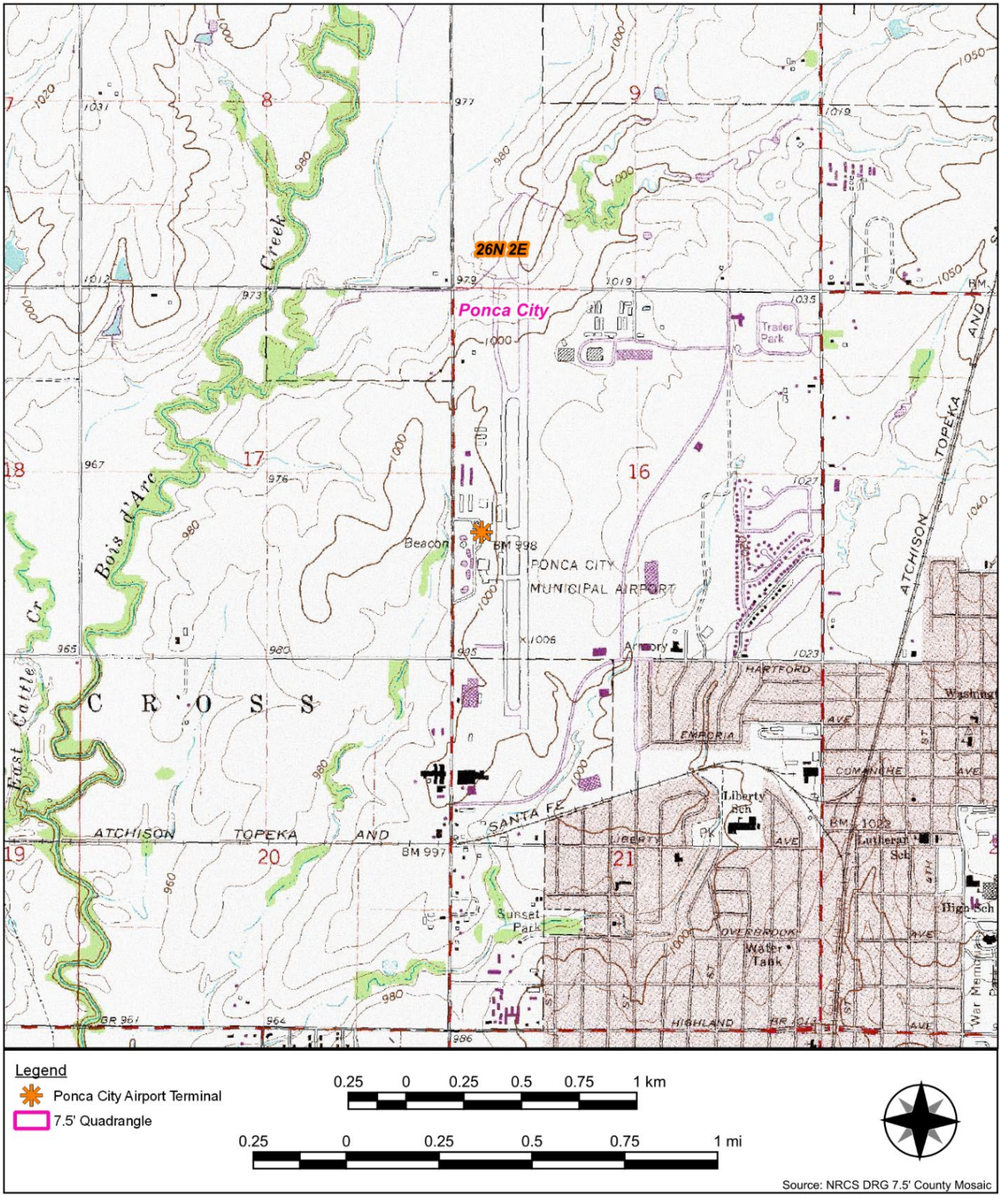


Figure 1: Project Location Map

Appendix G
National Wetlands Inventory Map

U.S. Fish and Wildlife Service

National Wetlands Inventory

Ponca City Regional Airport

June 10, 2025

Wetlands

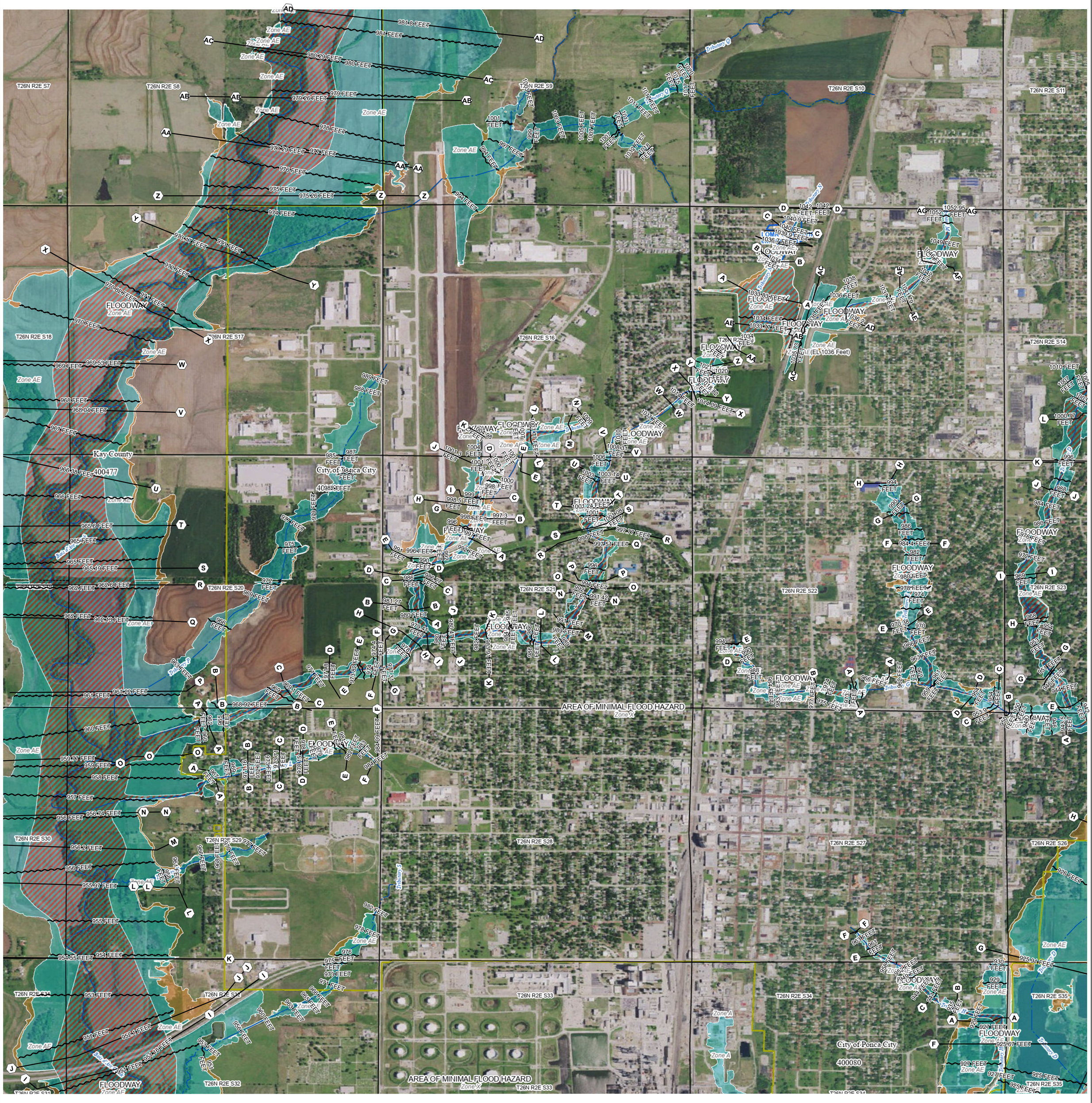
- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland
- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond
- Lake
- Other
- Riverine
- Project Area

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

National Wetlands Inventory (NWI)
This page was produced by the NWI mapper

Appendix H
Federal Emergency Management Act Floodplain Maps

97°7'30.88"W 36°45'13.23"N



97°3'44.17"W 36°41'1.88"N

FLOOD HAZARD INFORMATION

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR DRAFT FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS

- Without Base Flood Elevation (BFE) *Zone A, V, A99*
- With BFE or Depth *Zone AE, AO, AH, VE, AR*
- Regulatory Floodway

OTHER AREAS OF FLOOD HAZARD

- 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile *Zone X*
- Future Conditions 1% Annual Chance Flood Hazard *Zone X*
- Area with Reduced Flood Risk due to Levee See Notes *Zone X*
- Area with Flood Risk due to Levee *Zone D*

OTHER AREAS

- NO SCREEN Area of Minimal Flood Hazard *Zone X*
- Effective LOMRs
- Area of Undetermined Flood Hazard *Zone D*

GENERAL STRUCTURES

- Channel, Culvert, or Storm Sewer
- Levee, Dike, or Floodwall

OTHER FEATURES

- 20.2 Cross Sections with 1% Annual Chance
- 17.5 Water Surface Elevation
- Coastal Transect
- Coastal Transect Baseline
- Profile Baseline
- Hydrographic Feature
- 513 Base Flood Elevation Line (BFE)
- Limit of Study
- Jurisdiction Boundary

NOTES TO USERS

For information and questions about this Flood Insurance Rate Map (FIRM), available products associated with this FIRM, including historic versions, the current map date for each FIRM panel, how to order products, or the National Flood Insurance Program (NFIP) in general, please call the FEMA Map Information eXchange at 1-877-FEMA-MAP (1-877-336-2627) or visit the FEMA Flood Map Service Center website at https://msc.fema.gov. Available products may include previously issued Letters of Map Change, a Flood Insurance Study Report, and/or digital versions of this map. Many of these products can be ordered or obtained directly from the website.

Communities annexing land on adjacent FIRM panels must obtain a current copy of the adjacent panel as well as the current FIRM Index. These may be ordered directly from the Flood Map Service Center at the number listed above.

For community and countywide map dates, refer to the Flood Insurance Study Report for this jurisdiction.

To determine if flood insurance is available in this community, contact your Insurance agent or call the National Flood Insurance Program at 1-800-638-6620.

Basemap information shown on this FIRM was provided in digital format by USDA, Farm Service Agency (FSA). This information was derived from NAIP, dated April 11, 2018.

This map was exported from FEMA's National Flood Hazard Layer (NFHL) on **6/2/2025 9:35 PM** and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time. For additional information, please see the Flood Hazard Mapping Updates Overview Fact Sheet at https://www.fema.gov/media-library/assets/documents/118418

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards. This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date.

SCALE

Map Projection:
GCS, Geodetic Reference System 1980;
Vertical Datum: NAVD88

For information about the specific vertical datum for elevation features, datum conversions, or vertical monuments used to create this map, please see the Flood Insurance Study (FIS) Report for your community at https://msc.fema.gov

N

1 inch = 1,000 feet 1:12,000

0 500 1,000 2,000 3,000 4,000 Feet

0 105 210 420 630 840 Meters

NATIONAL FLOOD INSURANCE PROGRAM

FLOOD INSURANCE RATE MAP

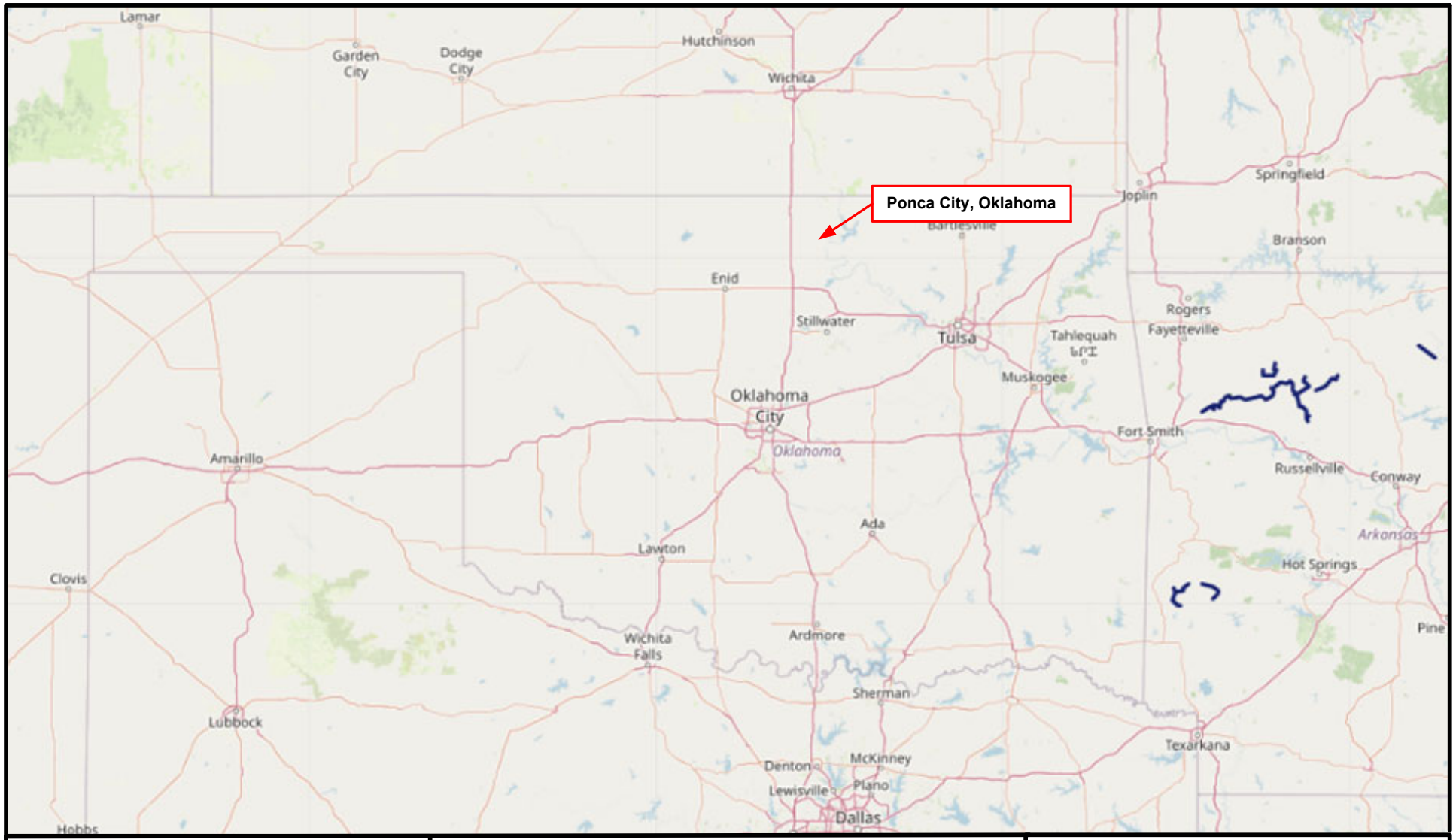
PANEL **405** OF **575**

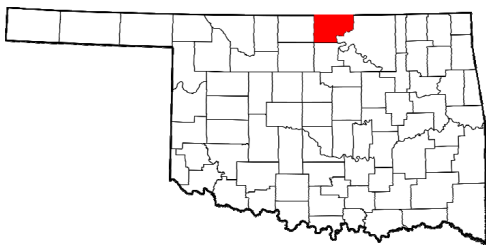
Panel Contains:

COMMUNITY	NUMBER	PANEL
CITY OF PONCA CITY	400080	0405
KAY COUNTY	400477	0405

MAP NUMBER
40071C0405E
EFFECTIVE DATE
December 17, 2013

Appendix I
Wild and Scenic Rivers Map





Kay County, Oklahoma
Part of SW/4 S16, T26N, R2E

Wild Rivers

Scenic Rivers

N
W E
S

0.0 100

Miles

BLACKSHARE ENVIRONMENTAL SOLUTIONS

Wild and Scenic Rivers Map

Ponca City Regional Airport
2231 Waverly St.
Ponca City, OK

PROJECT NO.: 4506-22 DATE: 01/24/2023

Appendix J
Notice of Availability Letter

NOTICE OF AVAILABILITY
DRAFT ENVIRONMENTAL ASSESSMENT (EA)
PONCA CITY REGIONAL AIRPORT
TERMINAL REPLACEMENT PROJECT

CEQ Unique ID Number: EAXX-021-12-ARP-1752141604

The Federal Aviation Administration (FAA) and the City of Ponca City, Oklahoma are proposing improvements at the Ponca City Regional Airport that include replacing the current terminal building (proposed action). This notice advises the public that a draft environmental assessment (EA) is available for public review and comment in accordance with the National Environmental Policy Act of 1969, 42 U.S.C §§ 4321 et seq., as amended, and Section 106 of the National Historic Preservation Act of 1966, (54 U.S.C. § 300101 et seq.

The proposed action includes constructing a new terminal and associated parking lot, demolishing the existing terminal, and expanding the apron on the airfield side of the new terminal. The proposed action would cause an adverse impact to the terminal building which was determined to be eligible for the National Register of Historic Places and is thus subject to both Section 106 of the National Historic Preservation Act and Section 4(f) of the Department of Transportation Act of 1966. The Draft EA includes a Section 106 Memorandum of Agreement (MOA), a legally binding document that formalizes how a federal agency will resolve adverse impacts on historic properties. The Draft EA also includes a Section 4(f) evaluation which is required when an agency cannot make a *de minimis* determination on the use of a Section 4(f) property.

The Draft EA has been prepared in accordance with FAA Order 1050.1F, Environmental Impacts: Policies and Procedures, and FAA Order 5050.4B, National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions.

The Draft EA is available for public review at www.poncacityok.gov\airportDEA and at the Ponca City Regional Airport at 2231 Waverly Street Ponca City, OK 74601 through February 15, 2026.

The public may submit comments to Ponca City Regional Airport at the address above or via e-mail at airport@poncacityok.gov All comments must be received by February 15, 2026 at 5 pm to be considered for this Draft EA and Draft Memorandum of Agreement.

PRIVACY NOTICE: Before including your address, phone number, email address, or other personal identifying information in your comment, be advised that your entire comment – including your personal identifying information – may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

Appendix K
Proof of Publication

PROOF OF PUBLICATION

State of Oklahoma

County of Kay

Teresa Pemberton, of lawful age, being duly sworn and authorized, says that she is the Classified / Legal Department Manager of THE PONCA CITY NEWS, a daily newspaper printed in the City of Ponca City, Kay County, Oklahoma, having paid a general subscription circulation in said County, with entrance into the United States mails as second class mail meter in Kay County, and published and printed in said County where delivered to the United States Mail, and said newspaper has been continuously and uninterruptedly published in said County during a period of one hundred four (104) consecutive weeks immediately prior to the first publication of the attached notice, advertisement or publication; and that said newspaper comes within the requirements of Chapter 4 of Title 25, Oklahoma Statutes 1951. as amended and complies with all other requirements of the laws of Oklahoma with reference to legal publications.

That said notice, a true copy of which is attached hereto, was published in the regular edition of said newspaper during the period and time of publication and not in a supplement, on the following dates:

January 15, 2026

Teresa Pemberton

Teresa Pemberton

Subscribed and sworn to before me this 15th day of January 2026.

Larissa Williams

Larissa Williams

Notary Public My Commission Expires 10/10/2027

PUBLISHED IN THE PONCA CITY NEWS ON JANUARY 15, 2026

NOTICE OF AVAILABILITY
DRAFT ENVIRONMENTAL ASSESSMENT (EA)
PONCA CITY REGIONAL AIRPORT
TERMINAL REPLACEMENT PROJECT

CEQ Unique ID Number: EAXX-021-12-ARP
1752141604

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The Draft EA has been prepared in accordance with FAA Order 1050.1F, Environmental Impacts: Policies and Procedures, and FAA Order 5050.4B, National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions.

The Draft EA is available for public review at www.poncacityok.gov\airportDEA and at the Ponca City Regional Airport at 2231 Waverly Street Ponca City, OK 74601 through February 15, 2026.

The public may submit comments to Ponca City Regional Airport at the address above or via e-mail at airport@poncacityok.gov All comments must be received by February 15, 2026 at 5 pm to be considered for this Draft EA and Draft Memorandum of Agreement.

PRIVACY NOTICE: Before including your address, phone number, email address, or other personal identifying information in your comment, be advised that your entire comment – including your personal identifying information – may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

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